



State of New Jersey  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT  
32 E. Hanover St., CN 028, Trenton, N.J. 08625

DR. MARWAN M. SADAT, P.E.  
DIRECTOR

LINO F. PEREIRA, P.E.  
DEPUTY DIRECTOR

Gregory J. Hollod, Ph.D.  
Senior Environmental Engineer  
E.I. DuPont de Nemours & Co.  
Petrochemicals Department  
1007 Market St.  
Wilmington, Delaware 19898

11 APR 1985

RE: Facility Closure, Pitt Consol, Newark, NJ, Essex County, 191 Doremus  
Avenue, EPA ID NO. NJD 004 948 188

Dear Dr. Hollod:

The Department of Environmental Protection has received October 1, 1984 notification with documentation as evidence of a completed closure of all hazardous waste storage and treatment aspects at the above referenced facility.

The certificate of closure by an independent registered professional engineer and by the owner/operator are in accordance with the requirements of N.J.A.C. 7:26-9.8 and the September 5, 1983 approved closure plan.

Additionally, a site inspection was conducted by a member of my staff on September 24, 1984 to verify clean conditions of tanks, pads, and storage areas.

On the basis of the foregoing, the Department concludes that the Pitt Consol Chemicals, Conoco Inc., Newark, Essex County, NJ, facility identified as:

EPA ID NO. NJD 004 948 138

has satisfactorily completed the closure of Hazardous Waste Treatment, Storage, and Disposal (TSDF).

The EPA identification number can be retained for the site as requested to identify the facility as a generator only provided that the requirements of N.J.A.C. 7:26-9.3(a) are in force and maintained. This was requested by Pitt Consol on October 1, 1984 to address the need to ship any classified waste encountered in the course of plant dismantlement. All manufacturing activity ceased in May, 1983.

11 APR 1985

Additionally, it should be noted that the sump, subject of item 1 of the Closure Plan, has been decontaminated of all hazardous waste, will remain in service, discharging non-hazardous waste water (storm water, etc.) to the Passaic Valley Sewage Commission under conditions of discharge permit no. 20401072 (also per your October 1, 1984 request).

Your company's hazardous waste facility is no longer included in DEP's list of "existing facilities" (see N.J.A.C. 7:26-1.4 and 12.3) and therefore does not need to conform with the interim operating requirements of N.J.A.C. 7:26-1 et seq. for existing facilities.

The issuance of this letter by the Department does not indicate, or imply, and should not be construed as a waiver of any requirements pursuant to the New Jersey Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq. and regulations promulgated thereunder concerning New Jersey Pollutant Discharge Elimination System, N.J.A.C. 7:14A-1 et seq. If your facility is in any of the regulated categories identified in the above cited regulations, you are hereby directed to apply for any and all permits necessary within ninety (or 180 days - at the option of DWR) to the Bureau of Ground Water Discharge Permits, CN 029, Trenton, New Jersey, 08625. Applications may be obtained by calling (609) 292-0424.

You are further reminded that to operate a hazardous waste facility without prior approval from the DEP is a violation of the Solid Waste Management Act N.J.S.A. 13:1E-1 et seq.

Very truly yours,



Frank Coolick, Chief  
Bureau of Hazardous Waste Engineering

EP5/slw

c: A. Chang, EPA, Region II  
R. Baker, EPA, Region II  
S. Schiffman, DWM, BHWPC  
J. Trela, DWR, BGWDP



CERTIFIED MAIL  
#P405 643 087  
RETURN RECEIPT REQUESTED



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT

32 E. Hanover St., CN 028, Trenton, N.J. 08625

November 23, 1983

LINO F. PEREIRA, P.E.  
DEPUTY DIRECTOR

MARWAN M. SADAT, P.E.  
DIRECTOR

Mr. David W. Hallis  
Pitt-Consol Chemicals  
Conoco, Inc.  
191 Doremus Avenue  
Newark, New Jersey 07105

RE: Complete Closure of Pitt-Consol Chemicals, Newark, Essex County  
EPA ID NO. NJD004948188

Dear Mr. Hallis:

The Department of Environmental Protection has reviewed your September 5, 1983 letter with the accompanying closure plan requesting complete closure of the Doremus Avenue site.

As a result of this review, the Department hereby grants approval for the complete closure of the referenced site. The following procedures shall be followed to complete this closure:

- 1) All tankage and process equipment will be free of hazardous materials and no hazardous materials will remain stored at the plant.
- 2) The Hot-Box will be cleaned of drums, steam rack disassembled and the entire unit decontaminated.
- 3) The drum storage area will be cleared of drums with the diked enclosed area cleaned and decontaminated.
- 4) The accumulated bagged asbestos will be disposed of to a DEP approved sanitary landfill.
- 5) The effluent sump and adjoining effluent phase separator will be emptied and cleaned. Disconnect and plug all inlet lines. Remove all appurtances such as pumps, skimmer, piping, etc.

New Jersey Is An Equal Opportunity Employer

David W. Halls

-2-

November 23, 1983

This closure shall be completed within 180 days of the date of this letter. Upon completion of closure, certification shall be submitted to the Department by Pitt-Consol Chemicals Co. and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan.

Should you have any questions on this matter, please contact Mr. Erwin Rutkowski of my staff at (609) 292-5361.

Very truly yours,



Edward J. Londres  
Assistant Director  
Engineering

EP5/jb

c: Joel Golumbek  
USEPA-Region II





State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT

32 E. Hanover St., CN 028, Trenton, N.J. 08625

MARWAN M. SADAT, P.E.  
DIRECTOR

November 22, 1983

LINO F. PEREIRA, P.E.  
DEPUTY DIRECTOR

M E M O R A N D U M

TO: Edward J. Londres  
Assistant Director, Engineering

FROM: Frank Coolick, Chief  
Bureau of Hazardous Waste Engineering

SUBJECT: Complete Closure of Pitt-Consol Conoco Plant, Newark, New Jersey  
Essex County, EPA ID NO. NJD004948188

The subject facility is classified as a generator TSD according to RCRA Part A application data listing S01, T01, T04, and S03 hazardous waste activities.

The plant, which manufactured cresol as their prime product, was closed in May 1983 and is currently staffed by a skeleton crew. Efforts to sell the property and equipment are underway.

The company requested approval of the proposed closure plan pursuant to N.J.A.C. 7:26-9.8 on June 17, 1983 and the site was visited by a staff member of July 29, 1983 with a revised closure plan received September 5, 1983.

The public was provided the opportunity for comment through a newspaper notice in the Newark Star Ledger on September 27, 1983 with a thirty (30) day comment period having expired. No verbal or written comments were received by this Bureau from the public on the subject facility.

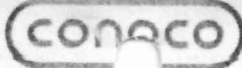
Attached is a draft approval of closure plans for the subject facility for your approval and signature.

  
F.C.

EP5/jb







Pitt Consol Chemicals

181 Doremus Avenue  
Newark, NJ 07105  
201 344 3800

February 15, 1984

NEW YORK, N.Y. 10007

Mr. Frank Coolick, Chief  
Division of Waste Management  
Bureau of Hazardous Waste Engineering  
32 East Hanover Street  
Trenton, New Jersey 08625

Re: TSD Facility Annual Report

Dear Mr. Coolick:

Attached is the Plant's annual report per the New Jersey  
Waste Regulations as specified in NJAC 7:26 - 7.6 (f)(2),  
for 1983.

If you have any questions, please call me.

Sincerely,

*David Hollis*

David W. Hollis  
Process Superintendent

cc: HDG, File - DEPTSD Annual Report

NSD 004948188





NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION  
HAZARDOUS WASTE FACILITY ANNUAL REPORT - Page 1

1. CALENDAR YEAR COVERED 1983
2. FACILITY'S NAME PIIT-CONSON CHEMICAL COMPANY
3. EPA ID NO. NJD 004948188
4. MAILING ADDRESS 191 DOREMUS AVENUE  
NEWARK, N.J. 07105
5. STREET ADDRESS OF FACILITY \_\_\_\_\_
6. FACILITY CONTACT DAVID HOLLIS PHONE NUMBER 201-344-3800
7. CLOSURE COST ESTIMATE \$ 27,570
8. POST-CLOSURE COST ESTIMATE (if applicable) \$ \_\_\_\_\_
9. CERTIFICATION STATEMENT

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties under N.J.S.A. 13:1E-1 et seq. for submitting false information, including the possibility of fine and imprisonment".

DAVID HOLLIS  
Print of Type Name

David Hollis  
Signature

2/15/84  
Date





NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION  
HAZARDOUS WASTE FACILITY ANNUAL REPORT - PART 11

11. FACILITY EPA ID # NJD 004948188  
12. GENERATOR NAME PITT-CONSOL CHEMICAL COMPANY - ON-SITE  
13. GENERATOR ADDRESS 191 DOREMUS AVENUE  
NEWARK, NJ 07105

14. GENERATOR EPA ID#

15. WASTE IDENTIFICATION

LINE NUMBER	a) DESCRIPTION OF WASTE	b) NJDEP HAZARDOUS WASTE NUMBER	c) HANDLING METHOD	d) AMOUNT OF WASTE	e) UNITS
1.	Waste Corrosive Solid, N.O.S.	D002	Disposed off-site	770.51	T
2.	Cresylic Acid Waste	U-054	S01/Disposed off-site	30.99	T
3.	Corrosive Liquid, N.O.S.	D002	Disposed off-site	202.83	T
			S02	452.09	T
4.	Waste Fuel Oil, No.4	D001	Disposed off-site	163.26	T
			S02	141.48	T
5.	Corrosive Solid, N.O.S. (Contaminated with up to 1600 ppm PCB)	D002	Disposed off-site	47.47	T
			S01	119.12	T
6.	Corrosive Liquid, N.O.S. (Contaminated with up to 1600 ppm PCB)	D002	Disposed off-site	20.00	T
			S02	72.25	T
7.	Corrosive Solid, N.O.S. (Clothing & rags contaminated with PCB & Cresylics)	D002	S01	17.56	T
8.	Crude Cresylic Acid	D001	Disposed off-site	16.24	T
9.	Sulfuric Acid, Spent	D002	Disposed off-site	8.5	T
			S01	3.6	T
10.	Soil contaminated with disulfide	D002	S01	6.1	T
11.	Solids contaminated with cresols	U052	S01	3.6	T
12.	Potassium Nitrate with/ Sodium Nitrite	D001	Disposed off-site	42.0	T
13.	Hazardous Waste (Fuel Oil)	X725	S01/Disposed off-site	2.0	T
14.	Thiocresol Solid	D002	S01/Disposed off-site	320.00	P
15.	Thiophenol Solid	P014	S01/Disposed off-site	1435.00	P
16.	Non-Hazardous Waste	-	S01/Disposed off-site	1.8	T
			S01	0.7	T



NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION  
HAZARDOUS WASTE FACILITY ANNUAL REPORT - 1 1

10 F. Quantity of each waste type treated, stored or disposed of at the facility:

LINE NUMBER	a) DESCRIPTION OF WASTE	b) NJDEP HAZARDOUS WASTE NUMBER	c) HANDLING METHOD	d) AMOUNT OF WASTE	e) UNIT
1.	Cresylic Acid Waste	U-054	S01	30.99	T
2.	Corrosive Liquid, N.O.S.	D002	S02	452.09	T
3.	Waste Fuel Oil, No.4	D001	S02	141.48	T
4.	Corrosive Solid, N.O.S. (Contaminated w/up to 1600 ppm PCB)	D002	S01	119.12	T
5.	Corrosive Liquid, N.O.S. (Contaminated w/up to 1600 ppm PCB)	D002	S02	72.25	T
6.	Corrosive Solid, N.O.S. (Clothing & rags contaminated with PCB & Cresylics)	D002	S01	17.56	T
7.	Sulfuric Acid, Spent	D002	S01	3.6	T
8.	Soil contaminated with disulfides	D002	S01	6.1	T
9.	Solids contaminated with cresols	U052	S01	3.6	T
10.	Hazardous Waste (Fuel Oil)	X725	S01	2.0	T
11.	Thiocresol Solid	D002	S01	320.0	P
12.	Thiophenol Solid	P014	S01	1435.0	P
13.	Non-Hazardous Waste	-	S01	2.5	T



NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION  
HAZARDOUS WASTE FACILITY ANNUAL REPORT - F. 1

10 G. Total quantities of each waste type consigned to each treatment, storage or disposal process:

LINE NUMBER	HANDLING METHOD	WASTE TYPE	NJDEP HAZARDOUS WASTE NUMBER	AMOUNT OF WASTE	UNITS
1.	S01	Cresylic Acid Waste	U054	30.99	T
2.		Corrosive Solid, N.O.S. (contaminated with up to 1600 ppm PCB)	D002	119.12	T
3.		Corrosive Solid, N.O.S. (clothing & rags contaminated with PCB & Cresylics)	D002	17.56	T
4.		Sulfuric Acid, Spent	D002	3.6	T
5.		Soil Contaminated with disulfides	D002	6.1	T
6.		Solids contaminated with cresols	U052	3.6	T
7.		Hazardous Waste (Fuel Oil)	X725	2.0	T
8.		Thiocresol Solid	D002	320.0	P
9.		Thiophenol Solid	P014	1435.0	P
10.		Non-Hazardous Waste	-	2.5	T
11.	S02	Corrosive Liquid, N.O.S.	D002	452.09	T
12.		Waste Fuel Oil, No. 4	D001	141.48	T
13.		Corrosive Liquid, N.O.S. (contaminated with up to 1600 ppm PCB)	D002	72.25	T



file - CR



CERTIFIED MAIL  
#P405 643 087  
RETURN RECEIPT REQUESTED

State of New Jersey  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF WASTE MANAGEMENT  
32 E. Hanover St., CN 028, Trenton, N.J. 08625

MARWAN M. SADAT, P.E.  
DIRECTOR

November 23, 1983

NOV 23 1983  
NEW YORK, N.Y.  
LINO F. PEREIRA, P.E.  
DEPUTY DIRECTOR

Mr. David W. Hallis  
Pitt-Consol Chemicals  
Conoco, Inc.  
191 Doremus Avenue  
Newark, New Jersey 07105

RE: Complete Closure of Pitt-Consol Chemicals, Newark, Essex County  
EPA ID NO. NJD004948188

Dear Mr. Hallis:

The Department of Environmental Protection has reviewed your September 5, 1983 letter with the accompanying closure plan requesting complete closure of the Doremus Avenue site.

As a result of this review, the Department hereby grants approval for the complete closure of the referenced site. The following procedures shall be followed to complete this closure:

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David W. Halls

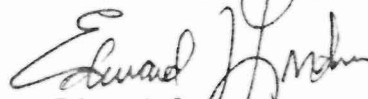
-2-

November 23, 1983

This closure shall be completed within 180 days of the date of this letter. Upon completion of closure, certification shall be submitted to the Department by Pitt-Consol Chemicals Co. and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan.

Should you have any questions on this matter, please contact Mr. Erwin Rutkowski of my staff at (609) 292-5361.

Very truly yours,



Edward J. Londres  
Assistant Director  
Engineering

EP5/jb

c: Joel Golumbek  
USEPA-Region II

AUG 21 10 50 AM '84

ENVIRONMENTAL COLLECTION  
ACQUISITION  
NEW YORK, N.Y. 10007



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT

32 E. Hanover St., CN 028, Trenton, N.J. 08625

MARWAN M. SADAT, P.E.  
DIRECTOR

November 22, 1983

LINO F. PEREIRA, P.E.  
DEPUTY DIRECTOR

M E M O R A N D U M

TO: Edward J. Londres  
Assistant Director, Engineering

FROM: Frank Coolick, Chief  
Bureau of Hazardous Waste Engineering

SUBJECT: Complete Closure of Pitt-Consol Conoco Plant, Newark, New Jersey  
Essex County, EPA ID NO. NJD004948188

The subject facility is classified as a generator TSD according to RCRA Part A application data listing S01, T01, T04, and S03 hazardous waste activities.

The plant, which manufactured cresol as their prime product, was closed in May 1983 and is currently staffed by a skeleton crew. Efforts to sell the property and equipment are underway.

The company requested approval of the proposed closure plan pursuant to N.J.A.C. 7:26-9.8 on June 17, 1983 and the site was visited by a staff member of July 29, 1983 with a revised closure plan received September 5, 1983.

The public was provided the opportunity for comment through a newspaper notice in the Newark Star Ledger on September 27, 1983 with a thirty (30) day comment period having expired. No verbal or written comments were received by this Bureau from the public on the subject facility.

Attached is a draft approval of closure plans for the subject facility for your approval and signature.

  
F.C.

EP5/jb



STATE OF NEW JERSEY }  
COUNTY OF ESSEX } ss

DO NOT WRITE IN THESE SPACES

**PUBLIC NOTICE**  
In Reference NJD004948188  
Date: 4-27-83  
Notice is hereby given that  
Pitt-Consol Chemicals  
Conoco, Inc.  
181 Doremus Avenue  
Newark, New Jersey 07105  
has submitted to the New Jersey  
Department of Environmental  
Protection (NJDEP) under the  
provisions of the New Jersey  
Administrative Code (N.J.A.C.)  
7:26-1 et seq. closure plans for a haz-  
ardous waste drum storage and  
cleaning area temporary hazard-  
ous waste pile, effluent sump,  
phase separator hazardous waste  
water treatment tanks, hazardous  
waste drum heating unit (Hot Box),  
and all processing and storage  
tanks used prior to the manufac-  
turing plant shutdown announced  
May 15, 1983.  
The plans have been submitted in  
compliance with standards in sub-  
chapters 9 and 11 and N.J.A.C. 7:26.  
This notice is being given to in-  
form the public that the NJDEP is  
presently considering the pro-  
posed plans. The closure plan  
includes removal of hazardous  
waste and decontamination of the  
areas cited.  
The plans are available for in-  
spection at the Bureau of Hazard-  
ous Waste Engineering, Division of  
Waste Management, Trenton, New  
Jersey 08625. All written comments  
must be submitted no later than  
thirty (30) days from the date of  
publication of this notice. \$42.00

Being duly sworn, according to law, on h oath say-  
eth that he is Clark of the  
Star-Ledger, in said County of Essex, and that the notice,  
of which the attached is a copy, was published in said  
paper on the 27 day of Sept 1983  
and continued therein for \_\_\_\_\_  
successively, at least once in each \_\_\_\_\_  
for Michael Dawson

Sworn to and subscribed  
before me this 27  
day of Sept, 1983

NOTARY PUBLIC of NEW JERSEY

JOHN B. BINGSON  
NEW JERSEY  
My Commission Expires Dec. 1, 1985

Document  
Received  
DI-10  
4/27/83

• PAYEE — SEE INSTRUCTIONS ON REVERSE SIDE •

ITEM NO	QUANTITY	UNIT	DELIVERY IS <input type="checkbox"/> FOB DESTINATION <input type="checkbox"/> FOB SHIPPING POINT	DESCRIPTION	UNIT PRICE	AMOUNT
1.	1	ea.		LEGAL ADVERTISEMENT RE: Pitt-Consol Chemicals Conoco, Inc. Newark, NJ 07105 	1.00	42.00
					TOTAL	42.00

**CERTIFICATION BY RECEIVING AGENCY**  
I CERTIFY THAT THE ABOVE ARTICLES HAVE BEEN RECEIVED  
ON SERVICE RENDERED AS STATED HEREIN  
Lois Leslie  
Bureau Chief

**CERTIFICATION BY APPROVAL OFFICER**  
I CERTIFY THAT THIS INVOICE IS CORRECT AND JUST, AND  
PAYMENT IS APPROVED.  
\_\_\_\_\_  
AUTHORIZED SIGNATURE  
\_\_\_\_\_  
TITLE  
\_\_\_\_\_  
DATE







State of New Jersey  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF WASTE MANAGEMENT  
32 E. Hanover St., CN 027, Trenton, N.J. 08625

DR. MARWAN M. SADAT  
ACTING DIRECTOR

September 21, 1983

LINO F. PEREIRA  
DEPUTY DIRECTOR

Star Ledger  
Star Ledger Plaza  
Newark, New Jersey 07101

ATTN: Legal Notices

Dear Sir/Madam:

Please publish the enclosed notice as a legal advertisement one (1) time only in your earliest available issue. The "date" to be inserted in the PUBLIC NOTICE should correspond to the date of its publication.

This is a legal notice; please do not typeset it as a display ad. Instead, set it solid in one column width using type sizes prescribed by statute.

I have enclosed a State Invoice (Form 100) for your convenience in billing us promptly. Be sure the "Payee Declaration" is signed, and a copy of the printed notice is attached to both the original and the first "duplicate" page of the Form 100. The copies must show the date of publication.

Send the completed form to my attention at the letterhead address.  
Thank you.

Very truly yours,

Frank Coolick, Chief  
Bureau of Hazardous Waste Engineering

EP5:jfb

Enclosures



TRANSACTION TYPE	BATCH NUMBER	NEW NUMBER
0		

STATE  
OF  
NEW JERSEY

FISCAL YEAR	TRANSACTION DATE	TITLE	DATE	DATE	DATE
84	09	21	83		

## INVOICE

VENDOR STATUS

☐

BLANK  
1 NO CHANGE  
2 NEW VENDOR  
3 ADDRESS CHANGE  
4 LOCATION CHANGE  
5 NEW VENDOR AND LOCATION  
6 VENDOR NO. CORRECTION

(10) ACCOUNT NUMBER				(11)	(12)	(13)
ORGANIZATION	FUND	PROGRAM	OBJECT	COST CENTER	PROJECT ACTIVITY	EXTENDED NUMBER
4910	100	230000	38	MCB		

(14) TOTAL AMOUNT	(15) AGENT NO.	(16) DELEGATION NUMBER

## (B) PAYEE NAME AND ADDRESS

(18) NAME (19) (20) STREET (21) CITY (22) STATE (23) ZIP CODE

Star Ledger  
Star Ledger Plaza  
Newark, NJ 07101

## D. PAYEE DECLARATION:

I certify that the within invoice is correct in all its particulars, that the described goods or services have been furnished or rendered, and that no bonus has been given or received on account of said invoice.

## (C) DEPARTMENT / AGENCY

NJDEP-DWM-BHWE  
32 East Hanover Street  
Trenton, NJ 08625

PAYEE SIGNATURE

TITLE

DATE

(24) COMMODITY CODE	(25) INDICATOR	(26) PAYEE REFERENCE — (LIMIT 34 CHARACTERS)	(27) PAYEE IDENTIFICATION NUMBER	(28) CONTRACT NUMBER
(31) LAST INVOICE	(32) CHECK	(33) ACCOUNTING USE ONLY	(34) ERROR SUSPENSE NUMBER	(35) DEL. REP.
SERIES	NUMBER			

• PAYEE — SEE INSTRUCTIONS ON REVERSE SIDE •

ITEM NO	QUANTITY	UNIT	DESCRIPTION	UNIT PRICE	AMOUNT
1.	1	ea.	LEGAL ADVERTISEMENT RE: Pitt-Consol Chemicals Conoco, Inc. Newark, NJ 07105		
				TOTAL	

## CERTIFICATION BY RECEIVING AGENCY

I CERTIFY THAT THE ABOVE ARTICLES HAVE BEEN RECEIVED OR SERVICES RENDERED AS STATED HEREIN.

SIGNATURE

TITLE

DATE

## CERTIFICATION BY APPROVAL OFFICER

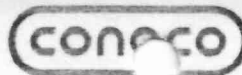
I CERTIFY THAT THIS INVOICE IS CORRECT AND JUST, AND PAYMENT IS APPROVED.

AUTHORIZED SIGNATURE

TITLE

DATE

RECEIVED  
JAN 23 1934  
U.S. DEPT. OF AGRICULTURE  
WASHINGTON, D.C.



Conoco Inc  
P O Box 1267  
Ponca City, OK 74601

405-767-3919

CERTIFIED MAIL

AUG 21 10 51 AM '84  
ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10007

January 9, 1984

Mr. Michael DeBonis, Chief  
Bureau of Hazardous Wastes  
New Jersey Department of  
Environmental Protection  
32 East Hanover Street  
Trenton, New Jersey 08625

Dear Mr. DeBonis:

Certificate of Insurance

Enclosed is our certificate of insurance. Should there be any questions,  
please contact me.

Cordially yours,

*Louise Skinner*

Louise Skinner  
Domestic Insurance  
Risk Management

ls  
Encs



C

# Certificate of Insurance

acord

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND DOES NOT ALTER THE COVERAGE AFFORDED BY THE POLICIES LISTED BELOW.

Marsh & McLennan, Inc.  
1221 Avenue of the Americas  
New York, NY 10020

## COMPANIES AFFORDING COVERAGES

- A Hartford Accident & Indemnity Company  
B  
C  
D  
E

Conoco Inc./Pitt-Consol Chemical Company  
P. O. Box 1267  
Ponca City, OK 74603

This is to certify that policies of insurance listed below have been issued to the insured named above and are in force at this time. Notwithstanding any requirement, term or condition of any contract or other document with respect to which this certificate may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.

COMPANY LETTER	TYPE OF INSURANCE	POLICY NUMBER	POLICY EXPIRATION DATE	Limits of Liability in Thousands (\$000)		
					EACH OCCURRENCE	AGGREGATE
A	GENERAL LIABILITY	10 CLR P12431E	1-1-84/85	BODILY INJURY	\$	\$
	<input checked="" type="checkbox"/> COMPREHENSIVE FORM			PROPERTY DAMAGE	\$	\$
	<input type="checkbox"/> PREMISES—OPERATIONS			BODILY INJURY AND PROPERTY DAMAGE (COMBINED)	\$ 1,000	\$
	<input type="checkbox"/> EXPLOSION AND COLLAPSE HAZARD			PERSONAL AND AD & M		\$
A	X POLLUTION*			BODILY INJURY (EACH PERSON)	\$	
	<input type="checkbox"/> UNDERGROUND HAZARD			BODILY INJURY (EACH ACCIDENT)	\$	
	<input type="checkbox"/> PRODUCTS/COMPLETED OPERATIONS HAZARD			PROPERTY DAMAGE	\$	
	<input type="checkbox"/> CONTRACTUAL AND FINANCIAL			BODILY INJURY AND PROPERTY DAMAGE (COMBINED)	\$	
	AUTOMOBILE LIABILITY			BODILY INJURY AND PROPERTY DAMAGE (COMBINED)	\$	\$
	<input type="checkbox"/> COMPREHENSIVE FORM			STATUTORY		\$
	<input type="checkbox"/> OWNED					
	<input type="checkbox"/> HIRED					
	EXCESS LIABILITY					
	<input type="checkbox"/> UMBRELLA FORM					
	<input type="checkbox"/> OTHER THAN UMBRELLA FORM					
	WORKERS' COMPENSATION and EMPLOYERS LIABILITY					
A	OTHER	10 CLR P12431E	1-1-84/85	Sudden	Each Occurrence 1,000	Aggregate 2,000
	X POLLUTION*			Non-Sudden	3,000	6,000

## DESCRIPTION OF OPERATIONS, LOCATIONS, VEHICLES

OPERATIONS: All operations usual to the business of the insured, including sudden, Non-sudden and accidental seepage, discharge, dispersal release, or escape from the operations at insured Newark, New Jersey chemical plant, 191 Doremus Ave., Newark, NJ 07105. (EPA #NJ004948188)

Cancellation: Should any of the above described policies be cancelled before the expiration date therein, the issuing company will be deemed to have 60 days written notice to the certificate holder, but failure to give such notice shall constitute no obligation on the part of any company to the company.

NAME AND ADDRESS OF CERTIFICATE HOLDER

Michael DeBonis  
Chief, Bureau of Hazardous Wastes  
New Jersey Dept. of Environmental Protection  
32 East Hanover Street  
Trenton, NJ 08625

DATE ISSUED

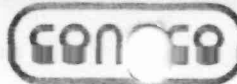
December 21, 1983

AUTHORIZED REPRESENTATIVE

Frank Prentice Haggood







Pitt-Consol Chemicals  
Consol Inc.  
191 Doremus Avenue  
Newark, NJ 07105  
(201) 344-3800

September 5, 1983

Mr. Frank Coolick, Chief  
Bureau of Hazardous Waste Engineering  
32 E. Hanover, CN-028  
Trenton, New Jersey 08625

Re: Closure Plan, Facility ID No. NJD00498188

Dear Mr. Coolick:

In your letter of August 22, 1983, you requested modifications to the closure plan for the Pitt-Consol Chemical facility at 191 Doremus Avenue in Newark.

The first request concerns two (2) underground storage tanks listed in the Plant's DPCC plan. These tanks were not used to store hazardous wastes. One tank was used as a collection tank for drain-off from the main loading/unloading area. The other tank was used to collect flushings from process piping. All material collected in these tanks was returned to the process as recycle material. This recycle material was not treated as a waste. It is our objective to clean, decontaminate and properly dispose of any hazardous wastes generated such that all tankage and process equipment will be free of hazardous materials and no hazardous materials will remain stored in the Plant.

The underground tanks listed in the DPCC plan were tested for leaks (by the procedure outlined in the plan) in May, 1982. No leaks were found.

The second request for modification concerned the surface water runoff after the Effluent Sump and Effluent Phase Separator are closed. The attached closure plan has been changed to reflect this concern.

If you need further information, please contact me at 201-344-3800.

*David Hollis*

David Hollis  
Process Superintendent

Attachment

c: Mr. Joel Golumbek, Chief  
(N. J. and Caribbean Hazardous Waste Section)  
Solid Waste Branch, U.S. EPA Region II  
26 Federal Plaza  
New York, New York 10278



Pitt-Consol Chemical Company  
HAZARDOUS WASTE MANAGEMENT  
CLOSURE PLAN

Pitt-Consol's Hazardous Waste Management facilities as per RCRA Notification permit (EPA ID No. NJD004948188) are:

Facility Description:

- I. Plant Effluent Sump - The plant's effluent flow to this sump by gravity where oil/floating organics are skimmed off and burned onsite for heat recovery. Effluent undergoes further treatment in the effluent phase separator tank before it is discharged to the PVSC (Passaic Valley Sewerage Commission) treatment systems.
- II. Effluent Phase Separator - This system utilizes tank F-169 to separate the lighter and heavier organic phases continuously from the aqueous phase. The organic material is burned in the boiler for heat recovery. The aqueous phase is discharged to PVSC treatment systems.  
  
The sump and separator are also used to process surface water runoff prior to its discharge to the PVSC. After closure of these facilities, surface runoff water will be generated through rainfall only, no process water will be discharged. Because of this, the surface runoff water can be considered non-hazardous under existing regulations.
- III. Waste Pile (Asbestos) - Asbestos material generated from the removal of old pre-cast insulation during equipment repair/maintenance, steam tracer tie-ins, etc., is stored in above ground waste pile. Asbestos is wetted with water, placed in special labeled bags and stored with tags indicating the weight and date.
- IV. Hot-Box - Drums containing residues, off-specification and spilled materials are melted down and recycled as fuel for heat recovery.
- V. Drum Storage and Cleaning Area -
  - A. South Tank Farm Storage - All drummed materials in Item VIII were transferred to this location. The off-specification materials are melted in the Hot-Box and burned for heat recovery. The solids/residues from hot-box operation are placed in DOT-approved drums and stored in this area for off-site disposal.
  - B. Drum Cleaning Area - This area is used primarily for steam cleaning of contaminated drums prior to internal reuse and/or disposal (off-site). Wastewater generated by this steam cleaning operation flows to the effluent sump for discharge to the PVSC.
- VI. Boron Fluoride Phosphoric Acid Storage Area - The material stored in this area used to be the old catalyst in the alkylation of phenol. There were 28 drums, 225 pounds each, of unused catalyst in the west end of Building 46. This material was shipped off-site on March 29, 1982.
- VII. Alkylation Reactor - This reactor (3,000 gallon capacity) was intended for neutralization of acidic and basic wastes. Since the reactor was never used for waste treatment, no further closure action is required.



- VIII. Temporary Drum Storage Area - This area was originally used as interim drum storage for the plant's residues, off-specification materials and contaminated solids awaiting internal recycle or shipment for off-site disposal. All drummed materials were transferred to Drum Storage and Cleaning Area (see item V above) and closed prior to May 1981. No further closure action is required.

Closure Procedures:

I. Plant Effluent Sump

The sump is 24 feet diameter and 8 feet deep of which 3 feet is above ground. The liquid level is 5 feet above the bottom of sump.

$$\begin{aligned}\text{Volume of Liquid} &= \frac{\pi D^2}{4} \times h = \pi \left(\frac{24 \text{ ft}}{2}\right)^2 \times 5 \text{ ft} \times 7.48 \text{ gal/CF} \\ &= 17,000 \text{ Gal.}\end{aligned}$$

The presence of a sump pump keeps the maximum level of sludge to 6 inches or less.

$$\begin{aligned}\text{Volume of Sludge} &= \frac{\pi D^2}{4} \times H = \pi \left(\frac{24 \text{ ft}}{2}\right)^2 \times 0.5 \text{ ft} \times 7.48 \text{ gal/CF} \\ &= 1,700 \text{ Gal.}\end{aligned}$$

Closure Procedure:

- a. Disconnect and plug all inlet lines.
- b. Remove oil and floating organics and burn for heat recovery.
- c. Pump aqueous phase to sanitary sewer for treatment at the PVSC treatment systems.
- d. Remove sludge and dispose off-site.
- e. Decontaminate sump by washing. Pump wastewater to sanitary sewer.
- f. Remove all appurtenances (pumps, skimmer, pipings, etc.).
- g. Secure sump by blinding inlet and outlet lines and cover.

II. Effluent Phase Separator

This separation tank is 18 feet high and 16 feet diameter and could handle 25,000 gallons.

Closure Procedure:

- a. Remove oil and organic phase for heat recovery.
- b. Pump wastewater to discharge.
- c. Wash the tank and pump wastewater to sanitary sewer.
- d. Secure the tank by blinding inlet and outlet lines.

III. Waste Pile (Asbestos)

Closure Procedure:

- a. Ship asbestos/asbestos-contaminated material to a DEP-approved sanitary landfill (ID No. 27).





IV. Hot Box

The Hot-Box is primarily used for melting off-specification products, spills, and laboratory unused samples. Depending upon the quality of the material, it is recycled to plant processes or burned for heat recovery. This system can handle 30 drums of materials in three days.

Volume: 8 ft x 8 ft x 40 ft = 2,560 CF

Closure Procedure

- a. Remove drums for off-site disposal.
- b. Dis-assemble steaming rack.
- c. Decontaminate Hot Box and concrete floor.
- d. Pump wastewater to sanitary sewer.

V. Drum storage and Cleaning Areas

The drum storage area (40 ft x 50 ft and 80 ft x 120 ft x 60 ft x 100 ft) is:

$$40 \text{ ft} \times 50 \text{ ft} + \frac{1}{2} [(80 \text{ ft} \times 100 \text{ ft}) + 60 \text{ ft} \times 120 \text{ ft}]$$

$$= 200 \text{ sq. ft.} + \frac{1}{2} [(8000) + (7200)] \text{ sq. ft.}$$

$$= 200 \text{ sq. ft.} + 7600 \text{ sq. ft.}$$

$$= 7800 \text{ sq. ft.}$$

This storage area could accomodate up to 500 drums. However, plant internal drum storage is limited to 80 drums (one truckload). Waste drums (hazardous and non-hazardous wastes) stored in this area are stencilled/labeled prior to off-site shipment and disposal.

Closure Procedure

- a. Ship drummed waste material for off-site disposal/
- b. Clean concrete floors and trenches. Drum solids for off-site disposal and pump/drain water washings to process sewer.

VI. No further closure action required.

VII. No further closure action required.

VIII. No further closure action required.

*David Hollis*

David Hollis  
Process Superintendent

c: HDG (File: RCRA Closure Plan)

Revised 9-05-83









State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT  
32 E. Hanover St., CN 028, Trenton, N.J. 08625

JACK STANTON  
DIRECTOR

August 22, 1983

LINO F. PEREIRA  
DEPUTY DIRECTOR

ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10007

AUG 21 10 51 AM '84

Mr. Alex V. Guanlao  
Environmental Engineer  
Pitt-Consol Chemicals  
Conoco, Inc.  
191 Doremus Avenue  
Newark, New Jersey 07105

RE: Closure Plan Facility ID NO. NJD004948188

Dear Mr. Guanlao:

The Bureau of Hazardous Waste Engineering acknowledges receipt of your June 17, 1983 letter and accompanying closure plan for the Pitt-Consol Chemical Company facility at 191 Doremus Avenue in Newark. In addition, a site inspection was conducted by Erwin Rutkowski of my staff on July 22, 1983.

N.J.A.C. 7:26-9.8(h)3 outlines the procedural time frame applicable to General Closure Requirements and, in accordance with same, the Department hereby requests that the submitted plan dated 6/1/83 be modified to address the following:

1. While the submitted plan did not address underground storage tanks, a review of DPCC plans reveals past use of two (2) underground storage tanks for hazardous wastes. These two tanks shall be cleaned and decontaminated and tested for holding integrity. If results are positive, so certify in the final certification. If negative, a provision in the plan shall be made to assure that the high water table existing at the plant site has not been contaminated.
2. Items 1 and 2 in the 6/1/83 plan (Effluent Sump and Effluent Phase Separator) are listed as the last items to be closed. The sump and separator are also used to process surface water runoff prior to discharge to the sewer authority in addition to the normal treatment of the various other waste streams generated at the site. The plan should be amended to show that at final closure, all future surface water runoff is not considered hazardous by existing regulations at this time of final closure.

*New Jersey Is An Equal Opportunity Employer*



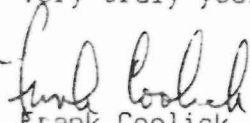
Alex V. Guanlao

-2-

August 22, 1983

If you should have any questions or require additional information, please contact Erwin Rutkowski of my staff at (609) 292-8129.

Very truly yours,



Frank Coolick, Chief

Bureau of Hazardous Waste Engineering

FC:ER:j5b19

c: Ron Corcory  
Bruce Venner







PAB-fil

Pitt-Consol Chemicals  
Conoco Inc.  
191 Doremus Avenue  
Newark, NJ 07105  
(201) 344-3800

September 5, 1983

Mr. Frank Coolick, Chief  
Bureau of Hazardous Waste Engineering  
32 E. Hanover, CN-028  
Trenton, New Jersey 08625

Re: Closure Plan, Facility ID No. NJD00498188

004948188

Dear Mr. Coolick:

In your letter of August 22, 1983, you requested modifications to the closure plan for the Pitt-Consol Chemical facility at 191 Doremus Avenue in Newark.

R02  
The first request concerns two (2) underground storage tanks listed in the Plant's DPCC plan. These tanks were not used to store hazardous wastes. One tank was used as a collection tank for drain-off from the main loading/unloading area. The other tank was used to collect flushings from process piping. All material collected in these tanks was returned to the process as recycle material. This recycle material was not treated as a waste. It is our objective to clean, decontaminate and properly dispose of any hazardous wastes generated such that all tankage and process equipment will be free of hazardous materials and no hazardous materials will remain stored in the Plant.

214  
Hollis  
9/25/83  
The underground tanks listed in the DPCC plan were tested for leaks (by the procedure outlined in the plan) in May, 1982. No leaks were found.

The second request for modification concerned the surface water runoff after the Effluent Sump and Effluent Phase Separator are closed. The attached closure plan has been changed to reflect this concern.

If you need further information, please contact me at 201-344-3800.

David Hollis

David Hollis  
Process Superintendent

Attachment

c: Mr. Joel Golumbek, Chief  
(N. J. and Caribbean Hazardous Waste Section)  
Solid Waste Branch, U.S. EPA Region II  
26 Federal Plaza  
New York, New York 10278

NEW YORK, N.Y. 10007  
ENVIRONMENTAL PROTECTION  
AGENCY  
SEP 13 3 48 PM '83  
REGION II  
HONORARY NEW YORK



PITT-CONSOL CHEMICAL COMPAL.-  
HAZARDOUS WASTE MANAGEMENT  
CLOSURE PLAN

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Pitt-Consol's Hazardous Waste Management facilities as per RCRA Notification permit (EPA ID No. NJD004948188) are:

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- V. Drum Storage and Cleaning Area -
  - A. South Tank Farm Storage - All drummed materials in Item VIII were transferred to this location. The off-specification materials are melted in the Hot-Box and burned for heat recovery. The solids/residues from hot-box operation are placed in DOT-approved drums and stored in this area for off-site disposal.
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- VII. Alkylation Reactor - This reactor (3,000 gallon capacity) was intended for neutralization of acidic and basic wastes. Since the reactor was never used for waste treatment, no further closure action is required.

TO : DIRECTOR, FBI (100-374301)  
FROM : SAC, NEW YORK (100-100000)

SUBJECT:

RE: [Illegible]

DATE: [Illegible]

BY: [Illegible]

RE: [Illegible]

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Closure Procedures:

I. Plant Effluent Sump

The sump is 24 feet diameter and 8 feet deep of which 3 feet is above ground. The liquid level is 5 feet above the bottom of sump.

$$\text{Volume of Liquid} = \frac{\pi D^2}{4} \times h = \pi \left( \frac{24 \text{ ft}}{4} \right)^2 \times 5 \text{ ft} \times 7.48 \text{ gal/CF}$$

$$= 17,000 \text{ Gal.}$$

The presence of a sump pump keeps the maximum level of sludge to 6 inches or less.

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Closure Procedure:

- a. Disconnect and plug all inlet lines.
- b. Remove oil and floating organics and burn for heat recovery.
- c. Pump aqueous phase to sanitary sewer for treatment at the PVSC treatment systems.
- d. Remove sludge and dispose off-site.
- e. Decontaminate sump by washing. Pump wastewater to sanitary sewer.
- f. Remove all appurtenances (pumps, skimmer, pipings, etc.).
- g. Secure sump by blinding inlet and outlet lines and cover.

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This separation tank is 18 feet high and 16 feet diameter and could handle 25,000 gallons.

Closure Procedure:

- a. Remove oil and organic phase for heat recovery.
- b. Pump wastewater to discharge.
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- d. Secure the tank by blinding inlet and outlet lines.

III. Waste Pile (Asbestos)

Closure Procedure:

- a. Ship asbestos/asbestos-contaminated material to a DEP-approved sanitary landfill (ID No. 27).



100-100000

VI. Transmittal Form - Form 100-100000  
This form is used to transmit the following information:  
1. Name of the person or organization  
2. Address  
3. City  
4. State  
5. Zip  
6. Date  
7. Signature  
8. Title  
9. Remarks

Volume of Study - 100-100000

Volume of Study - 100-100000

Volume of Study - 100-100000

Volume of Study - 100-100000

Volume of Study - 100-100000

Volume of Study - 100-100000

IV. Hot Box

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Volume: 8 ft x 8 ft x 40 ft = 2,560 CF

Closure Procedure

- a. Remove drums for off-site disposal.
- b. Dis-assemble steaming rack.
- c. Decontaminate Hot Box and concrete floor.
- d. Pump wastewater to sanitary sewer.

V. Drum storage and Cleaning Areas

The drum storage area (40 ft x 50 ft and 80 ft x 120 ft x 60 ft x 100 ft) is:

$$40 \text{ ft} \times 50 \text{ ft} + \frac{1}{2} [(80 \text{ ft} \times 100 \text{ ft}) + 60 \text{ ft} \times 120 \text{ ft})]$$

$$= 200 \text{ sq. ft.} + \frac{1}{2} [(8000) + (7200)] \text{ sq. ft.}$$

$$= 200 \text{ sq. ft.} + 7600 \text{ sq. ft.}$$

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This storage area could accomodate up to 500 drums. However, plant internal drum storage is limited to 80 drums (one truckload). Waste drums (hazardous and non-hazardous wastes) stored in this area are stencilled/labeled prior to off-site shipment and disposal.

Closure Procedure

- a. Ship drummed waste material for off-site disposal/
- b. Clean concrete floors and trenches. Drum solids for off-site disposal and pump/drain water washings to process sewer.

VI. No further closure action required.

VII. No further closure action required.

VIII. No further closure action required.

*David Hollis*

David Hollis  
Process Superintendent

c: HDG (File: RCRA Closure Plan)

Revised 9-05-83

IV. Testimony

In the presence of the jury, the witness testified that he had seen the defendant on the night of the murder.

At the time of the murder, the witness was at the residence of the victim.

The witness testified that he saw the defendant enter the residence at approximately 10:00 p.m.

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**MEMO**

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

TO Facility File   
FROM E. Rutkowski  DATE July 29, 1983  
SUBJECT Pitt-Consol Chemical Company, Newark, Essex County  
Facility No. NJD004948188

The writer visited Pitt-Consol Chemical Co. on Friday, July 22, 1983 for a closure/post-closure plan review and site visit from 10:00 am to noon.

Persons contacted were:

Harry D. Garrison, Plant Manager  
David W. Hallis, Process Superintendent  
Alex V. Guanlao, Environmental Engineer  
Bill Sharples and Walt Nedick accompanied the writer

Background

On May 23, 1983 major manufacturing operations at the 191 Doremus Avenue, Newark facility ceased after a May 19, 1983 public announcement of the plant shutdown. The original 11/19/80 Part A application listed the following process design capacities:

- T01 - 720,000 gal/day (tank treatment)
- T04 - 12,220 gal/day (treatment other)
- S01 - 50,000 gal (drum storage)
- S03 - 130 cubic yards (waste pile)

Pitt-Consol listed twelve (12) waste types associated with the manufacture of cresol, which was the plant's main product.

A permit no. 82-02-158 was issued by Hazard Management on 2/9/82 expiring 2/11/84 to implement an approved DPCC/DCR for a facility with a combined storage capacity of twelve(12) million gallons of chemicals and fuel oil (no 2).

Reported in this plan were three in-service underground tanks.

1. Gasoline storage tanks
2. Blend transfer line cleaning tank
3. Water collection main loading/unloading area tank.

Also reported in the plan was a high water table for the facility.

On June 17, 1983 this Bureau received a letter, a three page Closure plan dated 6/1/83, and eleven(11) instant photos related to the closure plan.

The plan targets a 9/30/83 completion date with a possible extension into the fourth quarter of 1983.

Pre-Site Visit Discussion

Prior to the site visit an office meeting was held to detail site oriented concerns regarding the closure plan.



The plant at the time of the visit (7/22/83) was operating with a small staff (5-6 people) with the final tank wagon of product reported being filled. The plant is completely fenced in and it was reported that there is seven (7) days per week around-the-clock security.

Pitt-Consol is a division of Conoco Inc. which in turn is a division of DuPont.

The reason for the shutdown was given as severe competition from other less costly processes with no opportunity to use the Newark plant's product in any of the other corporate entities. At the time of the shutdown 70 people were employed.

The actual plan (three pages) addressed eight (8) specific areas with only five (5) of them listing closure activities.

The cover letter listed other major activities such as cleaning or decontaminating tanks and process equipment. It was reported that Pitt-Consol had secured the services of SCA Chemical Services, Newark to begin by starting with ten storage tanks which were reported as not in active service at the time of the shutdown.

During the meeting Pitt-Consol pointed out that the sludges from these tanks were analyzed by SCA and some were found to have PCB contamination. This occurred subsequent to their June 17, 1983 letter.

Also pointed out by Pitt-Consol was the fact that Region II EPA Edison field personnel were to visit the site on Wednesday, July 27, 1983 relative to the contamination problem (EPA contact given as Fred Haber, 201-321-6693).

Further pointed out was that Bruce Venner, DEP, Yardville Field Operations was aware of the SCA findings and had visited the site according to Pitt-Consol.

#### Site Visit

A 36" x 48" site plan was used as a basis for locating points of interest and marked up accordingly during the aforementioned meeting.

A complete tour of the facility was made highlighting the areas discussed.

The Effluent Sump, Phase Separator, Hot Box, Drums Storage, Drum Cleaning, Waste Pile, Alkylation Reactor and the South Tank farm were viewed.

SCA personnel (3-4) were working in the latter area out of a mobile trailer located adjacent to the farm. It appeared that sampling was in progress and it was reported that they were working a 0400-1200 shift due to the warm weather conditions at this time of the year.

Also located in this area were six (6) leased tank wagons all reported as full and all marked with PCB contamination labels.

Pitt-Consol reported verbally results to date on the tanks tested as follows:

<u>Tank No.</u>	<u>Location</u>	<u>Results (PCB ppm)</u>
3	SWTF	Not received
4	SWTF	0
5	SWTF	0
1	SCTF	50
8	SCTF	Not received
21	SCTF	0



22	SCTF	500
12	SCTF	0
13	SCTF	1600
16	SETF	50

Total or individual tank current holdings were not disclosed but the largest no 21 and no 22 tanks were reported as one (1) million gallon capacities. The writer was also unable to secure the past history of ingredients or contents of the tanks although it was reported that they were used for various products, raw materials and fuel oil.

The presence of PCB's was reported by SCA to Pitt-Consol on materials removed off-site by SCA as a matter of waste analysis prior to disposal selection. Pitt-Consol reported that they initially speculated use of a contaminated tank wagon but confirmed that PCB's were present on-site by independent testing.

The source of the contamination by PCB's was not determined at the time of the writer's July 22, 1983 visit with Pitt-Consol personnel in the process of making determinations on the basis of past record history and analysis of same.

#### Comments

During the course of the site tour it was learned that Pitt-Consol's processing involved the use of two totally enclosed heating systems involving the use of continuously circulated high temperature oils as heating media for process control. Operating conditions of up to 700°F at 700 psi were reported as being utilized for these units whenever they were used in the various processes. The oils used in such types of equipment at one time consisted of Arochlor materials which have since been replaced by Dowtherm and Therminol NON PCB containing oils. There is a possibility that past usage of Arochlor oils at Pitt-Consol may contribute to the current situation.

As a further area of potential contamination there exists the possibility that fuel oil received by the facility may have been a blended stock which contained oils resulting from waste oil processes which did not completely remove such contaminants as PCB's and heavy metals.

A third possibility is from feed stocks which were used in the process at Pitt-Consol.

#### Recommendation

1. Field operations are involved in the situation as described and the writer has been in touch with Bruce Venner concerning the visit. Pitt-Consol was advised by the writer to continue cooperating with the Field Office concerning the recent developments relating to PCB's.

2. The writer is preparing a review of the Closure plan as submitted and as on-site reviewed and will incorporate other areas of concern to be addressed by the facility in a resubmitted plan to be prepared by Pitt-Consol.

E.R.



c: Frank Coolick

Ernie Kuhlwein

373

373

AUG 27 1964  
ENVIRONMENTAL ACTION  
NEW YORK, N.Y. 10007

*John*  
*John J. Ginn*

# HARTFORD SPECIALTY



March 23, 1983

123 William Street  
New York, New York 10038  
Telephone: (212) 553-8000

Regional Administrator  
U.S. Environmental Protection Agency  
26 Federal Plaza  
New York City, NY 10278

Attn.: RCRA Financial Requirements

Re: Conoco, Inc.

Dear Sir:

Enclosed please find a corrected "Sudden & Accidental" Pollution Endorsement. The original sent to your office, incorrectly stated the inception date as January 1, 1984. This has been corrected.

Yours truly,

*William G. O'Connor*

William G. O'Connor, Account Supervisor  
Hartford Specialty Company

WGO:1b-3  
1759B

Encl. Pollution Endorsement  
NJ D004948188

cc: Marsh & McLennan  
Conoco, Inc.

CORRESPONDENCE CONTROL  
REGION II

MAR 31 3 52 PM '83

ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y.

AIR & WASTE MANAGEMENT  
DIVISION  
APR 1 2 03 PM '83  
U.S. ENVIRONMENTAL  
PROTECTION AGENCY  
REGION II  
NEW YORK, N.Y.

Hartford Specialty Company • An Affiliate of  
The Hartford Insurance Group, Hartford, Connecticut 06115

GRANTS ADMINISTRATION  
BRANCH  
APR 6 2 08 PM '83  
ENVIRONMENTAL  
NEW YORK



AMENDATORY ENDORSEMENT POLLUTION LIABILITY



THE HARTFORD

This endorsement modifies such insurance as is afforded by the provisions of the policy relating to the following  
**COMPREHENSIVE GENERAL LIABILITY INSURANCE**  
**COMPREHENSIVE — PLUS SPECIAL GENERAL LIABILITY INSURANCE**  
**SMP LIABILITY INSURANCE**

Premium for This Endorsement \$ INCLUDED

**Part I Separate Limits of Liability Endorsement (Hazardous Waste Facility)**

It is agreed that:

1. The limits of liability stated in the Hazardous Waste Facility Pollution Liability Endorsement in Part II apply separately to such insurance as is afforded by the policy in connection with the Insured's obligation to demonstrate financial responsibility at the facilities described therein.
2. Such limits of liability apply collectively to all such facilities (and not separately to each) and are in lieu of and not in addition to any other limits of liability stated elsewhere in the policy.
3. The "each occurrence" limit applies to all bodily injury and all property damage arising out of a single occurrence.
4. The annual "aggregate" limit applies to all damages because of all bodily injury and all property damage which occurs during the policy period.
5. For the purpose of determining the limit of the company's liability, all bodily injury and property damage arising out of a sudden and accidental discharge, dispersal, release or escape of irritants, contaminants or pollutants, including all bodily injury and property damage arising out of all subsequent exposure of persons or property to such substances, shall be considered as arising out of a single occurrence.
6. Part I of this endorsement shall be cancelled automatically by cancellation of the Hazardous Waste Facility Pollution Liability Endorsement in Part II.

**Part II Hazardous Waste Facility Pollution Liability Endorsement**

1. This endorsement certifies that the policy to which the endorsement is attached provides pollution liability insurance covering bodily injury and property damage in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA Identification Number: NJD 004948188

Name: CONOCO INC

Address: NEWARK N J

for sudden accidental occurrences. The limits of liability are \$ 1,000,000  
"each occurrence" and \$ 2,000,000 annual aggregate, exclusive of legal defense costs.

2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy, provided, however, that any provisions of the policy inconsistent with subsections (a) through (e) of the Paragraph 2 are hereby amended to conform with subsections (a) through (e):

THE HOUSE

ENCLOSURE

GRANTS ADMINISTRATION  
RECEIVED

APR 6 2 08 PM '83

ENVIRONMENTAL  
NEW YORK, N.Y.

CONROCC INC  
NEW YORK, N.Y.

1,000,000

WATKINS ACCIDENT AND LIABILITY COMPANY  
100 WALL STREET, NEW YORK, N.Y.

HAZARDOUS WASTE FACILITY CERTIFICATE  
OF  
LIABILITY INSURANCE

The Hartford Accident & Indemnity Company

Hereby certifies that it has issued liability insurance covering bodily injury and property damage to

Name Conoco Inc.  
Mailing Address P. O. Box 1267  
Ponca City, OK 74601

In connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147. The coverage applies at

<u>E.P.A. I.D. NUMBER</u>	<u>NAME</u>	<u>ADDRESS</u>
1. <u>NJDO04948188</u>	<u>Conoco Inc.</u>	<u>Newark, New Jersey</u>

2.

For:

☐ sudden accidental occurrences

☒ non-sudden accidental occurrences

☐ sudden and non-sudden accidental occurrences

The limits of liability are \$ 3,000,000 each occurrence\*  
\$ 6,000,000 annual aggregate\*  
exclusive of Legal Defense Costs

The coverage is provided under

Policy Number 10 CLR P12321E

Issued on January 1, 1983

The effective date of said policy is January 1, 1983

The insurer further certifies the following with respect to the insurance described on  
Page 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (f) or 265.147 (f).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151 (j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

William G. O'Connor  
Signature of Authorized Representative of the Insurer

William G. O'Connor  
Type Name

Account Supervisor  
Title

123 William Street New York, NY 10038  
Address of Representative



PAB - Tim Taccare

John pls  
log in

Pitt-Consol Chemicals  
Conoco Inc.  
191 Doremus Avenue  
Newark, NJ 07105  
(201) 344-3800

January 31, 1983

Mr. Ernest Regna, Chief  
Hazardous and Solid Waste Branch  
U.S. EPA, Region II  
26 Federal Plaza, Room 905  
New York, New York 10278

Re: 1982 Generator/Facility Annual Reports

Dear Mr. Regna:

Attached are Pitt-Consol Chemical Company (EPA ID-NJD004948188) annual reports for the calendar year 1982. These reports are being submitted in accordance with the RCRA rules (40 CFR 262 through 40 CFR 265).

Should you have any question or need further information, please call Alejandro Guanlao (Environmental Engineer) or me at (201) 344-3800.

Sincerely,

Harry D. Garrison  
Plant Manager

sag

Registered Mail-RRR

RECEIVED  
FEB 8 3 06 PM '83  
ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10007

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EPA U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE REPORT		I. TYPE OF HAZARDOUS WASTE REPORT	
PLEASE PLACE LABEL IN THIS SPACE		PART A: GENERATOR ANNUAL REPORT	
		THIS REPORT IS FOR THE YEAR ENDING DEC. 31. 19	
		PART B: FACILITY ANNUAL REPORT	
		THIS REPORT FOR YEAR ENDING DEC. 31. 1982	
		PART C: UNMANIFESTED WASTE REPORT	
		THIS REPORT IS FOR A WASTE RECEIVED (day, mo., & yr.) - - - 19	
<b>INSTRUCTIONS:</b> You may have received a preprinted label attached to the front of this pamphlet; affix it in the designated space above-left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Sections II, III, and IV below blank. If you did not receive a preprinted label, complete all sections. "Installation" means a single site where hazardous waste is generated, treated, stored, or disposed of. Please refer to the specific instructions for generators or facilities before completing this form. The information requested herein is required by law (Section 3002/3004 of the Resource Conservation and Recovery Act).			
<b>II. INSTALLATION'S EPA I.D. NUMBER</b>			
F NJ D O 0 4 9 4 8 1 8 8 1			
<b>III. NAME OF INSTALLATION</b>			
P I T T C O N S O L C H E M I C A L C O M P A N Y			
<b>IV. INSTALLATION MAILING ADDRESS</b>			
STREET OR P.O. BOX			
3 1 9 1 D O R E M U S A V E N U E			
CITY OR TOWN			
4 N E W A R R			
ST. ZIP CODE			
N J 0 7 1 0 5			
<b>V. LOCATION OF INSTALLATION</b>			
STREET OR ROUTE NUMBER			
5			
CITY OR TOWN			
6			
ST. ZIP CODE			
VI. INSTALLATION CONTACT			
NAME (last and first)			
2 G U A N L A O A L E J A N D R O			
PHONE NO. (area code & no.)			
2 0 1 - 3 4 4 - 3 8 0 0			
<b>VII. TRANSPORTATION SERVICES USED (for Part A reports only)</b>			
List the EPA Identification Numbers for those transporters whose services were used during the reporting year represented by this report.			
<b>VIII. COST ESTIMATES FOR FACILITIES (for Part B reports only)</b>			
A. COST ESTIMATE FOR FACILITY CLOSURE			
B. COST ESTIMATE FOR POST CLOSURE MONITORING AND MAINTENANCE (disposal facilities only)			
G \$ 0 0 0 , 0 2 7 , 5 7 0			
H \$			
<b>IX. CERTIFICATION</b>			
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.			
Harry D. Garrison, Plant Manager			
A. PRINT OR TYPE NAME			
SIGNATURE			
1/31/83			
C. DATE SIGNED			

1936

TOUR. ... W 10



Please print or type with ELITE type (12 characters/line).

GSA No. 12345-XX  
Form Approved OMB No. 158-R00XX



U.S. ENVIRONMENTAL PROTECTION AGENCY  
**FACILITY REPORT - PARTS B & C**  
(Collected under the authority of Section 3004 of RCRA.)

FOR OFFICIAL USE ONLY (Items 1 & 3)	1. DATE RECEIVED 11-11-91	XVI. TYPE OF REPORT (enter an "X") <input checked="" type="checkbox"/> PART B <input type="checkbox"/> PART C	XVII. FACILITY'S EPA I.D. NO. GNJ D004948188
	2. RECEIVED BY		

XVIII. GENERATOR'S EPA I.D. NO.	XX. GENERATOR ADDRESS (street or P.O. box, city, state, & zip code)
---------------------------------	---

XIX. GENERATOR NAME (specify) On-site
--

LINE NUMBER	A. DESCRIPTION OF WASTE	B. EPA HAZARDOUS WASTE NUMBER (see instructions)	C. HAND- LING METHOD (enter code)	D. AMOUNT OF WASTE (1)				E UNIT OF MEASURE (enter code)
1	Cresylic Acid Waste	11054U052	S01				18787	P
2	Thiophenol	P014	S01				600	P
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								

XXII. COMMENTS (enter information by line number - see instructions)

(1) Amount of waste material in storage as of December 31, 1982.





EPA U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE REPORT		I. TYPE OF HAZARDOUS WASTE REPORT	
PLEASE PLACE LABEL IN THIS SPACE		PART A: GENERATOR ANNUAL REPORT	
		THIS REPORT IS FOR THE YEAR ENDING DEC. 31, 1982	
		PART B: FACILITY ANNUAL REPORT	
		THIS REPORT FOR YEAR ENDING DEC. 31, 19	
		PART C: UNMANIFESTED WASTE REPORT	
		THIS REPORT IS FOR A WASTE RECEIVED (day, mo., & yr.) - - 19	
<p>INSTRUCTIONS: You may have received a preprinted label attached to the front of this pamphlet; affix it in the designated space above-left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Sections II, III, and IV below blank. If you did not receive a preprinted label, complete all sections. "Installation" means a single site where hazardous waste is generated, treated, stored, or disposed of. Please refer to the specific instructions for generators or facilities before completing this form. The information requested herein is required by law (Section 3002/3004 of the Resource Conservation and Recovery Act).</p>			
II. INSTALLATION'S EPA I.D. NUMBER			
F N J D 0 0 4 9 4 8 1 8 8 1			
III. NAME OF INSTALLATION			
P I T T C O N S O L C H E M I C A L C O M P A N Y			
IV. INSTALLATION MAILING ADDRESS			
STREET OR P.O. BOX			
3 1 9 1 D O R E M U S A V E N U E			
CITY OR TOWN			
4 N E W A R K			
ST. ZIP CODE			
N J 0 7 1 0 5			
V. LOCATION OF INSTALLATION			
STREET OR ROUTE NUMBER			
5			
CITY OR TOWN			
6			
ST. ZIP CODE			
VI. INSTALLATION CONTACT			
NAME (last and first)			
2 G U A N L A O A L E J A N D R O			
PHONE NO. (area code & no.)			
2 0 1 - 3 4 4 - 3 8 0 0			
VII. TRANSPORTATION SERVICES USED (for Part A reports only)			
List the EPA Identification Numbers for those transporters whose services were used during the reporting year represented by this report.			
1. SCA Chemical Services - NJD089216790			
2. SJ Transportation Company - NJT000009027			
3. Rollins Environmental Services - NJD053288239			
4. Chemical Leaman - PAD084770023			
5. Keystone Shipping Company - PAD000000370			
VIII. COST ESTIMATES FOR FACILITIES (for Part B reports only)			
A. COST ESTIMATE FOR FACILITY CLOSURE			
B. COST ESTIMATE FOR POST CLOSURE MONITORING AND MAINTENANCE (disposal facilities only)			
IX. CERTIFICATION			
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.			
Harry D. Garrison, Plant Manager			
A. PRINT OR TYPE NAME			
B. SIGNATURE			
C. DATE SIGNED			
1/31/83			



U.S. ENVIRONMENTAL PROTECTION AGENCY  
**GENERATOR ANNUAL REPORT - PART A**  
(Collected under the authority of Section 3002 of RCRA.)FOR OFFICIAL  
USE ONLY  
(Items 1 and 2)

1. DATE RECEIVED

- 1 9

X. GENERATOR'S EPA I.D. NO.

2. TYPE OF REPORT

GNJD004948188

XI. FACILITY'S EPA I.D. NO.

NJ089216790

XIII. FACILITY ADDRESS (street or P.O. box, city, state, &amp; zip code)

XII. FACILITY NAME (specify)

SCA Chemical Services

100 Lister Avenue  
Newark, New Jersey 07105

## XIV. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZ- ARD CLASS	C. EPA HAZARDOUS WASTE NUMBER (see instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (enter code)
1	Sodium Hydroxide, Liquid	0 2	D 0 0 2	6 4 0 0	P
2	RQ, BF <sub>3</sub> ·H <sub>3</sub> PO <sub>4</sub> Corrosive Liquid, N.O.S.	0 2	D 0 0 2	6 3 0 0	P
3	Empty Drums, N.O.S.	- -		2 8 0	P
4	RQ, Sulfuric Acid Corrosive Liquid, N.O.S.	0 2	D 0 0 2	9 0 0	P
5					
6					
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9					
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11					
12					

## XV. COMMENTS (enter information by line number - see instructions)

Item 1 - Material was sold to SCA Chemical Services, Newark, New Jersey.

Item 3 - Empty drums from item 2 which weighed approximately 10 pounds each.

Item New Jersey Manifests Used

- 1) NJ-0035504
- 2) NJ-0035506
- 3) NJ-0035509
- 4) NJ-0131145



Form with header information and multiple sections for data entry, including fields for name, address, and contact details. The form is divided into several columns and rows, with some sections containing checkboxes and dropdown menus. The text is faint and difficult to read, but the structure is clear.

Form Header: [Illegible text]

Form Body: [Illegible text]

Form Footer: [Illegible text]


 U.S. ENVIRONMENTAL PROTECTION AGENCY  
**GENERATOR ANNUAL REPORT - PART A**  
 (Collected under the authority of Section 3002 of RCRA.)
FOR OFFICIAL  
USE ONLY  
(Items 1 and 2)

1. DATE RECEIVED

- - - 19

X. GENERATOR'S EPA I.D. NO.

GNJD004948188

2. TYPE OF REPORT

XI. FACILITY'S EPA I.D. NO.

SCD070375985

XIII. FACILITY ADDRESS (street or P.O. box, city, state, &amp; zip code)

Rte. 1, Box 55, Pinewood  
South Carolina 2915

XII. FACILITY NAME (specify)

SCA Chemical Services

XIV. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZ- ARD CLASS	C. EPA HAZARDOUS WASTE NUMBER (see instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (enter code)
1	Non-Hazardous Solid Waste, N.O.S.	-		39820	P
2	Non-Hazardous Solid Waste, N.O.S.	-		41520	P
3	Non-Hazardous Solid Waste, N.O.S.	-		47256	P
4	Non-Hazardous Solid Waste, N.O.S.	-		38120	P
5	Hazardous Solid Waste	02	U101U188	37180	P
6	Cresylic Acid Waste	02	U054	24000	P
7	Non-Hazardous Solid Waste, N.O.S.	-		20290	P
8	Non-Hazardous Solid Waste, N.O.S.	-		42120	P
9	Non-Hazardous Solid Waste, N.O.S.	-		41720	P
10	Cresylic Acid Waste	02	U054	10248	P
11	Non-Hazardous Solid Waste, N.O.S.	-		17422	P
12					

XV. COMMENTS (enter information by line number - see instructions)

Item

New Jersey/South Carolina Manifests Used

1.	NJ - 0035501/SC - 13502
2.	NJ - 0035502/SC - 13903
3.	NJ - 0035503/SC - 23299
4.	NJ - 0035505/SC - 29635
5.	NJ - 0035507/SC - 50186
6. & 7.	NJ - 0035508/SC - 50187
8.	NJ - 0035510/SC - 50188
9.	NJ - 0110401/SC - 29636
10. & 11.	NJ - 0110402/SC - 13939






 U.S. ENVIRONMENTAL PROTECTION AGENCY  
**GENERATOR ANNUAL REPORT - PART A**  
 (Collected under the authority of Section 3002 of RCRA.)
FOR OFFICIAL  
USE ONLY  
(Items 1 and 2)

1. DATE RECEIVED

- 1 9

X. GENERATOR'S EPA I.D. NO.

2. TYPE OF REPORT

GNJD004948188

XI. FACILITY'S EPA I.D. NO.

SCD070375985

XIII. FACILITY ADDRESS (street or P.O. box, city, state, &amp; zip code)

Rte. 1, Box 55, Pinewood  
South Carolina 2915

XII. FACILITY NAME (specify)

SCA Chemical Services

XIV. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZ- ARD CLASS	C. EPA HAZARDOUS WASTE NUMBER (see instructions)	D. AMOUNT OF WASTE	UNIT OF MEASURE (enter code)
1	Cresylic Acid Waste	0 2	U 0 5 4	4 0 4 8 0	P
2	Non-Hazardous Solid Waste, N.O.S.	- -		7 4 0	P
3	Cresylic Acid Waste	0 2	U 0 5 4	4 4 3 9 0	P
4	Cresylic Acid Waste	0 2	U 0 5 4	3 0 6 3 8	P
5	RO, Waste Material	0 2	U 0 5 4	4 5 3 0	P
6	Hazardous Waste, N.O.S.	1 2	X 9 1 0	1 4 0 0	P
7	Non-Hazardous Solid Waste, N.O.S.	- -		1 0 8 0	P
8	Non-Hazardous Solid Waste, N.O.S.	- -		4 3 8 7	P
9	Hazardous Waste, N.O.S.	1 2	D 0 0 7	2 2 9 5	P
10	Cresylic Acid Waste	0 2	U 0 5 4	2 6 4 7 7	P
11	Corrosive Solid, N.O.S.	0 2	D 0 0 2	5 9 2 0	P
12	RQ, Waste Material, N.O.S.	0 2	U 0 5 4	1 9 0 0	P

XV. COMMENTS (enter information by line number - see instructions)

Item

New Jersey/South Carolina Manifests Used

1 & 2. NJ - 0110403/SC - 54698  
 3. NJ - 0110404/SC - 37563  
 4,5,6,7,8, & 9. NJ - 0110405/SC - 35849  
 10,11, & 12 NJ - 0131146/SC - 43013



U.S. ENVIRONMENTAL PROTECTION AGENCY  
**GENERATOR ANNUAL REPORT - PART A**  
(Collected under the authority of Section 3002 of RCRA.)FOR OFFICIAL  
USE ONLY  
(Items 1 and 2)

1. DATE RECEIVED

- 19

X. GENERATOR'S EPA I.D. NO.

GNJD004948188

2. TYPE OF REPORT

XI. FACILITY'S EPA I.D. NO.

SCD070375985

XIII. FACILITY ADDRESS (street or P.O. box, city, state, &amp; zip code)

Rte. 1, Box 55, Pinewood  
South Carolina 2915

XII. FACILITY NAME (specify)

SCA Chemical Services

XIV. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZ- ARD CLASS	C. EPA HAZARDOUS WASTE NUMBER (see instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (UNIT CODE)
1	Cresylic Acid Waste	02	1054	4463	P
2	Non-Hazardous Solid Waste, N.O.S.			35638	P
3	Non-Hazardous Waste, N.O.S.			613	P
4					
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11					
12					

XV. COMMENTS (enter information by line number - see instructions)

Item

New Jersey/South Carolina Manifests Used

1, 2, &amp; 3

NJ - 0131149/SC - 43014

Form with header and multiple sections. The header contains the text "GENERAL REPORT" and "REPORT OF THE". The form is divided into several sections, including a large table with multiple columns and rows, and several smaller sections for additional information. The text is faint and difficult to read.

Section	Sub-section	Item	Value
Table 1	Item 1	1	100
		2	200
		3	300
		4	400
Table 2	Item 2	1	100
		2	200
		3	300
		4	400
Table 3	Item 3	1	100
		2	200
		3	300
		4	400
Table 4	Item 4	1	100
		2	200
		3	300
		4	400


 U.S. ENVIRONMENTAL PROTECTION AGENCY  
**GENERATOR ANNUAL REPORT - PART A**  
 (Collected under the authority of Section 3002 of RCRA.)
FOR OFFICIAL  
USE ONLY  
(Items 1 and 2)

1. DATE RECEIVED

- - - 1 9

X. GENERATOR'S EPA I.D. NO.

2. TYPE OF REPORT

GNJD004948188

XI. FACILITY'S EPA I.D. NO.

NJ D 053288239

XIII. FACILITY ADDRESS (street or P.O. box, city, state, &amp; zip code)

XII. FACILITY NAME (specify)

Rollins Environmental Services

Box 221, Bridgeport  
New Jersey 08014

XIV. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HA- ZARD CLASS	C. EPA HAZARDOUS WASTE NUMBER (see instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (enter code)
1	Crude Cresylic Acid Waste, N.O.S.	07	D001U054	48200	P
2	Crude Cresylic Acid Waste, N.O.S.	07	D001U054	12480	P
3	Crude Cresylic Acid Waste, N.O.S.	07	D001U054	34740	P
4					
5					
6					
7					
8					
9					
10					
11					
12					

XV. COMMENTS (enter information by line number - see instructions)

Item

New Jersey Manifest Used

1. NJ - 0110366
2. NJ - 0110367
3. NJ - 0110368




 U.S. ENVIRONMENTAL PROTECTION AGENCY  
**GENERATOR ANNUAL REPORT - PART A**  
 (Collected under the authority of Section 3002 of RCRA.)
FOR OFFICIAL  
USE ONLY  
(Items 1 and 2)

1. DATE RECEIVED

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X. GENERATOR'S EPA I.D. NO.

2. TYPE OF REPORT

GNJD004948188

XI. FACILITY'S EPA I.D. NO.

PAD087098653

XIII. FACILITY ADDRESS (street or P.O. box, city, state, &amp; zip code)

Allegheny Avenue and Delaware River  
Philadelphia, PA 19134

XII. FACILITY NAME (specify)

(1) Unitank Terminal Services

## XIV. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZ- ARD CLASS	C. EPA HAZARDOUS WASTE NUMBER (see instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (enter code)
1	RQ, WASTE CORROSIVE LIQUID, N.O.S. (PHENOL, DIMETHYL PHENOL, & CRESOLS)	0 2	U 1 8 8	4 5 6 4 0	P
2	" " "	0 2	U 1 8 8	4 5 0 4 0	P
3	" " "	0 2	U 1 8 8	4 4 0 4 0	P
4	" " "	0 2	U 1 8 8	4 3 7 0 0	P
5	" " "	0 2	U 1 8 8	4 2 9 6 0	P
6	" " "	0 2	U 1 8 8	4 2 9 6 0	P
7	" " "	0 2	U 1 8 8	4 3 6 0 0	P
8	" " "	0 2	U 1 8 8	1 3 2 6 0	P
9	" " "	0 2	U 1 8 8	4 4 4 8 0	P
10	" " "	0 2	U 1 8 8	4 3 4 2 0	P
11	" " "	0 2	U 1 8 8	4 3 5 6 0	P
12	" " "	0 2	U 1 8 8	4 4 9 2 0	P

## XV. COMMENTS (enter information by line number - see instructions)

(1) Unitank Terminal Services - Interim storage facility prior to bulk shipment (via ship) to Empak Inc., Texas.

1. PA-4334120 Pennsylvania Manifests
2. PA-4334131
3. PA-4334142
4. PA-4334153
5. PA-4334164
6. PA-4334190

7. PA-6510324
8. PA-6510335
9. PA-6510350
10. PA-6510362
11. PA-6510372
12. PA-6510383



UNITED STATES DEPARTMENT OF AGRICULTURE  
BUREAU OF PLANT INDUSTRY  
WASHINGTON, D. C.

REPORT OF THE  
COMMISSIONER OF PLANT INDUSTRY  
FOR THE YEAR 1911

BY  
J. H. COOPER, CHIEF OF BUREAU

WASHINGTON, D. C.: GOVERNMENT PRINTING OFFICE, 1912.

Price, 10 cents.

For sale by the Superintendent of Documents, Washington, D. C.

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Second-class postage paid at Washington, D. C.

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 U.S. ENVIRONMENTAL PROTECTION AGENCY  
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 (Collected under the authority of Section 3002 of RCRA.)
FOR OFFICIAL  
USE ONLY  
(Items 1 and 2)

1. DATE RECEIVED

- 1 9

X. GENERATOR'S EPA I.D. NO.

2. TYPE OF REPORT

GNJD0049481881

XI. FACILITY'S EPA I.D. NO.

PAD087098653

XIII. FACILITY ADDRESS (street or P.O. box, city, state, &amp; zip code)

Allegheny Avenue and Delaware River  
Philadelphia, PA 19134

XII. FACILITY NAME (specify)

(1) Unitank Terminal Services

XIV. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZ- ARD CLASS	C. EPA HAZARDOUS WASTE NUMBER (see instructions)	D. AMOUNT OF WASTE	UNIT OF MEASURE (enter code)
1	RQ, WASTE CORROSIVE LIQUID, N.O.S. (PHENOL, DIMETHYL PHENOL, & CRESOLS)	02	U188	46060	P
2	" " "	02	U188	45360	P
3	" " "	02	U188	44980	P
4	" " "	02	U188	43220	P
5	" " "	02	U188	44280	P
6	" " "	02	U188	43580	P
7	" " "	02	U188	43660	P
8	" " "	02	U188	44280	P
9	" " "	02	U188	43520	P
10	" " "	02	U188	43960	P
11	" " "	02	U188	43140	P
12	" " "	02	U188	43520	P

XV. COMMENTS (enter information by line number - see instructions)

(1) Unitank Terminal Services - Interim storage facility prior to bulk  
shipment (via ship) to Empak Inc., Texas.

Pennsylvania Manifests

- |               |                |
|---------------|----------------|
| 1. PA-6510394 | 7. PA-6510490  |
| 2. PA-6510405 | 8. PA-6510501  |
| 3. PA-6510420 | 9. PA-6510512  |
| 4. PA-6510431 | 10. PA-6510534 |
| 5. PA-6510442 | 11. PA-6510560 |
| 6. PA-6510464 | 12. PA-6510571 |




 U.S. ENVIRONMENTAL PROTECTION AGENCY  
**GENERATOR ANNUAL REPORT - PART A**  
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FOR OFFICIAL  
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1. DATE RECEIVED

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X. GENERATOR'S EPA I.D. NO.

2. TYPE OF REPORT

GNJD0004948188

XI. FACILITY'S EPA I.D. NO.

PAD087098653

XIII. FACILITY ADDRESS (street or P.O. box, city, state, &amp; zip code)

Allegheny Avenue and Delaware River  
Philadelphia, PA 19134

XII. FACILITY NAME (specify)

(1) Unitank Terminal Services

XIV. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HA- ZARD CLASS	C. EPA HAZARDOUS WASTE NUMBER (see instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (see instructions)
1	RQ, WASTE CORROSIVE LIQUID, N.O.S. (PHENOL, DIMETHYL PHENOL, & CRESOLS)	0 2	U 1 8 8	4 3 6 0 0	P
2	" " "	0 2	U 1 8 8	4 3 1 2 0	P
3	" " "	0 2	U 1 8 8	4 3 7 2 0	P
4	" " "	0 2	U 1 8 8	4 4 4 0 0	P
5	" " "	0 2	U 1 8 8	4 3 8 6 0	P
6	" " "	0 2	U 1 8 8	4 2 5 6 0	P
7	" " "	0 2	U 1 8 8	4 4 9 4 0	P
8	" " "	0 2	U 1 8 8	4 3 9 8 0	P
9	" " "	0 2	U 1 8 8	4 4 4 6 0	P
10	" " "	0 2	U 1 8 8	4 4 1 6 0	P
11	" " "	0 2	U 1 8 8	4 4 1 6 0	P
12	" " "	0 2	U 1 8 8	4 3 6 6 0	P

XV. COMMENTS (enter information by line number - see instructions)

(1) Unitank Terminal Services - Interim storage facility prior to bulk  
shipment (via ship) to Empak Inc., TX.

## Pennsylvania Manifests

1. PA - 6510593	7. PA - 6510700
2. PA - 6510604	8. PA - 6510722
3. PA - 6510615	9. PA - 6510733
4. PA - 6510630	10. PA - 6510781
5. PA - 6510663	11. PA - 6510792
6. PA - 6510674	12. PA - 6511503




 U.S. ENVIRONMENTAL PROTECTION AGENCY  
**GENERATOR ANNUAL REPORT - PART A**  
 (Collected under the authority of Section 3002 of RCRA.)

FOR OFFICIAL USE ONLY (Items 1 and 2)	1. DATE RECEIVED	-	-	1	9	X. GENERATOR'S EPA I.D. NO.
	2. TYPE OF REPORT	GNJD0004948188				

XI. FACILITY'S EPA I.D. NO.	XIII. FACILITY ADDRESS (street or P.O. box, city, state, & zip code)
PAD087098653	Allegheny Avenue and Delaware River Philadelphia, PA 19134

 XII. FACILITY NAME (specify)  
 (1) Unitank Terminal Services

## XIV. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HA- ZARD CLASS	C. EPA HAZARDOUS WASTE NUMBER (see instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (enter code)
1	RQ, WASTE CORROSIVE LIQUID, N.O.S. (PHENOL, DIMETHYL PHENOL, & CRESOLS)	02	U188	44140	P
2	" " "	02	U188	43820	P
3	" " "	02	U188	43160	P
4	" " "	02	U188	45160	P
5	" " "	02	U188	44440	P
6	" " "	02	U188	43340	P
7	" " "	02	U188	43360	P
8	" " "	02	U188	44100	P
9	" " "	02	U188	42800	P
10	" " "	02	U188	44720	P
11	" " "	02	U188	45800	P
12	" " "	02	U188	43720	P

## XV. COMMENTS (enter information by line number - see instructions)

(1) Unitank Terminal Services - Interim storage facility prior to bulk shipment via ship) to Empak Inc., TX.

## Pennsylvania Manifests

- |                 |                  |
|-----------------|------------------|
| 1. PA - 6511540 | 7. PA - 6511632  |
| 2. PA - 6511551 | 8. PA - 6511643  |
| 3. PA - 6511562 | 9. PA - 6511654  |
| 4. PA - 6511573 | 10. PA - 6511761 |
| 5. PA - 6511584 | 11. PA - 6511772 |
| 6. PA - 6511621 | 12. PA - 6511794 |




 U.S. ENVIRONMENTAL PROTECTION AGENCY  
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X. GENERATOR'S EPA I.D. NO.

2. TYPE OF REPORT

GNJD0049481881

XI. FACILITY'S EPA I.D. NO.

PAD087098653

XIII. FACILITY ADDRESS (street or P.O. box, city, state, &amp; zip code)

Allegheny Avenue and Delaware River  
Philadelphia, PA 19134

XII. FACILITY NAME (specify)

(1) Unitank Terminal Services

XIV. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HA- ZARD CLASS	C. EPA HAZARDOUS WASTE NUMBER (see instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (UNIT CODE)
1	RQ, WASTE CORROSIVE LIQUID, N.O.S. (PHENOL, DIMETHYL PHENOL, & CRESOLS)	02	U188	45200	P
2	" " "	02	U188	44740	P
3	" " "	02	U188	44400	P
4	" " "	02	U188	44120	P
5	" " "	02	U188	42840	P
6	" " "	02	U188	45040	P
7	" " "	02	U188	43600	P
8	" " "	02	U188	44260	P
9	" " "	02	U188	43980	P
10	" " "	02	U188	44140	P
11	" " "	02	U188	43200	P
12	" " "	02	U188	43420	P

XV. COMMENTS (enter information by line number - see instructions)

(1) Unitank Terminal Services - Interim storage facility prior to bulk shipment (via ship) to Empak Inc., TX

## Pennsylvania Manifests

- |                 |                |
|-----------------|----------------|
| 1. PA - 6511805 | 7. PA-6511912  |
| 2. PA - 6511820 | 8. PA-6511923  |
| 3. PA - 6511835 | 9. PA-6512693  |
| 4. PA - 6511864 | 10. PA-6512715 |
| 5. PA - 6511890 | 11. PA-6512741 |
| 6. PA - 6511901 | 12. PA-6512822 |






 U.S. ENVIRONMENTAL PROTECTION AGENCY  
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(Items 1 and 2)

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X. GENERATOR'S EPA I.D. NO.

2. TYPE OF REPORT

GNJD0004948188

XI. FACILITY'S EPA I.D. NO.

PAD087098653

XIII. FACILITY ADDRESS (street or P.O. box, city, state, &amp; zip code)

Allegheny Avenue and Delaware River  
Philadelphia, PA 19134

XII. FACILITY NAME (specify)

(1) Unitank Terminal Services

XIV. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HA- ZARD CLASS	C. EPA HAZARDOUS WASTE NUMBER (see instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (unit code)
1	RQ, WASTE CORROSIVE LIQUID, N.O.S. (PHENOL, DIMETHYL PHENOL, & CRESOLS)	02	U188	44720	P
2	" " "	02	U188	42700	P
3	" " "	02	U188	42800	P
4	" " "	02	U188	44900	P
5	" " "	02	U188	43360	P
6	" " "	02	U188	42888	P
7	" " "	02	U188	43620	P
8					
9					
10					
11					
12					

XV. COMMENTS (enter information by line number - see instructions)

(1) Unitank Terminal Services - Interim storage facility prior to bulk shipment (via ship) to Empak, Inc., TX.

## Pennsylvania Manifests

1. PA-6512833
2. PA-6512844
3. PA-6512870
4. PA-6512881
5. PA-6512892
6. PA-6523683
7. PA-6512682

10-10-59

CONFIDENTIAL - SECURITY MATTER

TO: DIRECTOR, FBI

FROM: SAC, NEW YORK (100-100000)

SUBJECT: [Illegible]

[Illegible text block containing several paragraphs of a memorandum or report.]

[Illegible text block containing several paragraphs of a memorandum or report.]

[Illegible text block containing several paragraphs of a memorandum or report.]

[Illegible text block containing several paragraphs of a memorandum or report.]


 U.S. ENVIRONMENTAL PROTECTION AGENCY  
**GENERATOR ANNUAL REPORT - PART A**  
 (Collected under the authority of Section 3002 of RCRA.)
FOR OFFICIAL  
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(Items 1 and 2)

1. DATE RECEIVED

- - - 19

X. GENERATOR'S EPA I.D. NO.

GNJD004948188

2. TYPE OF REPORT

XI. FACILITY'S EPA I.D. NO.

TXD097673149

XIII. FACILITY ADDRESS (street or P.O. box, city, state, &amp; zip code)

2759 Battleground Road  
Deer Park, Texas

XII. FACILITY NAME (specify)

Empak Inc.

XIV. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HA- ZARD CLASS	C. EPA HAZARDOUS WASTE NUMBER (see instructions)	D. AMOUNT OF WASTE (1)	E. UNIT OF MEASURE (enter code)
1	RQ, Waste Corrosive Liquid, N.O.S., (phenol, dimethyl phenol & Cresols)	02	U188	2974566	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XV. COMMENTS (enter information by line number - see instructions)

(1) Amount of waste shipped to Empak Inc., Texas  
(via vessel "Puerto Rico") = 2,974,566 lbs (343,770 Gallons)

a. Amount of waste originated from Pitt-Consol Chemical Company  
(see section XIV pages 7 through 12 above)  
= 2,916,240 lbs (336,774 Gallons)

b. Interim Storage tank wash water (Unitank Terminal Services)  
= 58,326 lbs (6,996 Gallons)  
Total (sum of (a) and (b)) = 2,974,566 lbs.



FEB 15 1983

Mr. Alex Guanala  
Pitt-Consol Chemical Co.  
191 Doremus Avenue  
Newark, N.J. 07105

Subject: 1981 Hazardous Waste Annual  
Report; EPA ID NJD004948188

Dear Mr. Guanala:

This is to confirm that the U.S. Environmental Protection Agency has received your company's 1981 Hazardous Waste Annual Report on January 10, 1983. Revised information was subsequently received on January 17, 1983.

If you have any further questions, please contact John Hajduk of my staff at (212) 264-9880.

Sincerely yours,

Richard A. Baker  
Chief  
Permits Administration Branch  
Office of Policy & Management

2PM-PA:HAJDUK:X9880:av:2/14/83

2PM-PA  
HAJDUK

2PM-PA  
ZAMBRATTO

2PM-PA  
BAKER

JA 2/14/83

ZAMBRATTO  
2-14-83

2/14/83

FEB 15 1983

Mr. Alex Guarnais  
Pitt-Consol Chemical Co.  
191 Doremus Avenue  
Newark, N.J. 07102

Subject: 1981 Hazardous Waste Annual  
Report; EPA ID NJD004948188

Dear Mr. Guarnais:

This is to confirm that the U.S. Environmental Protection  
Agency has received your company's 1981 Hazardous Waste Annual  
Report on January 10, 1983. Revised information was subsequently  
received on January 17, 1983.

If you have any further questions, please contact John Hajduk  
of my staff at (212) 264-9880.

Sincerely yours,

Richard A. Baker  
Chief  
Permits Administration Branch  
Office of Policy & Management

2PM-PA:HAJDUK:X9880:av:2/14/83

2PM-PA  
HAJDUK  
2-14-83  
2PM-PA  
ZAMBRATO  
2-14-83  
2PM-PA  
BAKER  
2-14-83



# AMENDATORY ENDORSEMENT POLLUTION LIABILITY

AIR & WASTE MANAGEMENT

JAN 5 4 44 PM '83

U.S. ENVIRONMENTAL PROTECTION AGENCY

THE HARTFORD

This endorsement modifies such insurance as is afforded by the provisions of the policy relating to the following  
**NEW YORK. COMPREHENSIVE GENERAL LIABILITY INSURANCE**  
**COMPREHENSIVE — PLUS SPECIAL GENERAL LIABILITY INSURANCE**  
**SMP LIABILITY INSURANCE**

Premium for This Endorsement \$ Included

## Part I Separate Limits of Liability Endorsement (Hazardous Waste Facility)

It is agreed that:

1. The limits of liability stated in the Hazardous Waste Facility Pollution Liability Endorsement in Part II apply separately to such insurance as is afforded by the policy in connection with the insured's obligation to demonstrate financial responsibility at the facilities described therein.
2. Such limits of liability apply collectively to all such facilities (and not separately to each) and are in lieu of and not in addition to any other limits of liability stated elsewhere in the policy.
3. The "each occurrence" limit applies to all bodily injury and all property damage arising out of a single occurrence.
4. The annual "aggregate" limit applies to all damages because of all bodily injury and all property damage which occurs during the policy period.
5. For the purpose of determining the limit of the company's liability, all bodily injury and property damage arising out of a sudden and accidental discharge, dispersal, release or escape of irritants, contaminants or pollutants, including all bodily injury and property damage arising out of all subsequent exposure of persons or property to such substances, shall be considered as arising out of a single occurrence.
6. Part I of this endorsement shall be cancelled automatically by cancellation of the Hazardous Waste Facility Pollution Liability Endorsement in Part II.

## Part II Hazardous Waste Facility Pollution Liability Endorsement

1. This endorsement certifies that the policy to which the endorsement is attached provides pollution liability insurance covering bodily injury and property damage in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA Identification Number: NJD 004948188  
 Name: Conoco, Inc.  
 Address: Newark, NJ  
 for sudden accidental occurrences. The limits of liability are \$ 1,000,000  
 "each occurrence" and \$ 2,000,000 annual aggregate, exclusive of legal defense costs.
2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy, provided, however, that any provisions of the policy inconsistent with subsections (a) through (e) of the Paragraph 2 are hereby amended to conform with subsections (a) through (e):
  - (a) Bankruptcy or insolvency of the insured shall not relieve the insurer of its obligations under the policy to which this endorsement is attached.
  - (b) The insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
  - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
  - (d) Cancellation of this endorsement, whether by the insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.
  - (e) Any other termination of this endorsement will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.

Attached to and forming part of Policy No. 10 CLR P12421E  
 issued by Hartford Accident & Indemnity Company, herein called the Insurer,  
 (Name of Insurer)

of 123 William Street New York, NY 10038 to Conoco, Inc.  
 (Address of Insurer) (Name of Insured)

of P. O. Box 1267 Ponca City, OK 74601  
 (Address of Insured)

this 1st day of January, 19 83. The effective date of said policy is  
1st day of January, 19 84.

I hereby certify that the wording of this endorsement is identical to the wording specified in 40 CFR 264.151(i) as such regulation was constituted on the date first above written, and that the insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

William G. O'Connor  
 (Signature of Authorized Representative of Insurer)  
William G. O'Connor

(Type Name)  
Account Supervisor Authorized Representative of Hartford Accident & Indemnity Co.  
 (Title) (Name of Insurer)

123 William Street New York, NY 10038  
 (Address of Representative)

*Handwritten notes at top left.*

AIR MAIL

GRANTS ADMINISTRATION  
BRANCH  
REGION II  
JAN 7 3 04 PM '83  
ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, NEW YORK 10001

ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y.  
JAN 3 2 10 PM '83  
CORRESPONDENCE CONTROL  
REGION II



## AMENDATORY ENDORSEMENT POLLUTION LIABILITY

NEW YORK



THE HARTFORD

This endorsement modifies such insurance as is afforded by the provisions of the policy relating to the following  
COMPREHENSIVE GENERAL LIABILITY INSURANCE  
COMPREHENSIVE — PLUS SPECIAL GENERAL LIABILITY INSURANCE  
SMP LIABILITY INSURANCE

Premium for This Endorsement \$ Included

## Part I Separate Limits of Liability Endorsement (Hazardous Waste Facility)

It is agreed that:

1. The limits of liability stated in the Hazardous Waste Facility Pollution Liability Endorsement in Part II apply separately to such insurance as is afforded by the policy in connection with the insured's obligation to demonstrate financial responsibility at the facilities described therein.
2. Such limits of liability apply collectively to all such facilities (and not separately to each) and are in lieu of and not in addition to any other limits of liability stated elsewhere in the policy.
3. The "each occurrence" limit applies to all bodily injury and all property damage arising out of a single occurrence.
4. The annual "aggregate" limit applies to all damages because of all bodily injury and all property damage which occurs during the policy period.
5. For the purpose of determining the limit of the company's liability, all bodily injury and property damage arising out of a sudden and accidental discharge, dispersal, release or escape of irritants, contaminants or pollutants, including all bodily injury and property damage arising out of all subsequent exposure of persons or property to such substances, shall be considered as arising out of a single occurrence.
6. Part I of this endorsement shall be cancelled automatically by cancellation of the Hazardous Waste Facility Pollution Liability Endorsement in Part II.

## Part II Hazardous Waste Facility Pollution Liability Endorsement

1. This endorsement certifies that the policy to which the endorsement is attached provides pollution liability insurance covering bodily injury and property damage in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA Identification Number NJD 004948188

Name: Conoco, Inc.Address: Newark, NJfor sudden accidental occurrences. The limits of liability are \$ 1,000,000  
"each occurrence" and \$ 2,000,000 annual aggregate, exclusive of legal defense costs.

2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy, provided, however, that any provisions of the policy inconsistent with subsections (a) through (e) of the Paragraph 2 are hereby amended to conform with subsections (a) through (e):
  - (a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.
  - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
  - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
  - (d) Cancellation of this endorsement, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.
  - (e) Any other termination of this endorsement will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.

Attached to and forming part of Policy No. 10 CLR P12420Eissued by Hartford Accident & Indemnity Company, herein called the Insurer,  
(Name of Insurer)of 123 William Street New York, NY 10038 to Conoco, Inc.  
(Address of Insurer) (Name of Insured)of P. O. Box 1267 Ponca City, OK 74601  
(Address of Insured)this 15th day of July, 1982. The effective date of said policy is  
1st day of January, 1982.

I hereby certify that the wording of this endorsement is identical to the wording specified in 40 CFR 264.151(i) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

William G. O'Connor  
(Signature of Authorized Representative of Insurer)  
William G. O'Connor

(Type Name)

Account Supervisor

Authorized Representative of Hartford Accident & Indemnity Co.

(Title)

(Name of Insurer)

123 William Street New York, NY 10038

(Address of Representative)

AIR & WASTE MANAGEMENT  
DIVISION

JUL 12 3 57 PM '82

U.S. ENVIRONMENTAL  
PROTECTION AGENCY,  
REGION II  
NEW YORK, N.Y.





Conoco Inc.  
P.O. Box 1267  
Ponca City, OK 74601

OFFICE OF ENVIRONMENTAL PROTECTION  
ADMINISTRATION  
BRANCH  
REGION II  
AUG 26 1 09 PM '82  
ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, NEW YORK 10007

August 23, 1982

Ms. Helen S. Beggan  
U.S. Environmental Protection Agency  
Region II, Administration Branch  
26 Federal Plaza  
New York, NY 10007

Dear Ms. Beggan:

RCRA Liability Requirements

Conoco Inc. owns a facility operated by Pitt-Consol Chemical Company in the state of New Jersey, which is in interim status and subject to the financial assurance and liability requirements of 40 CFR 264 and 265. The EPA identification number and address are:

Pitt-Consol Chemical Company  
191 Doremus Avenue  
Newark, NJ 07105  
EPA No. NJD 004948188

Conoco has complied with Section 7:26-9.13(b) of the New Jersey State Regulations for Hazardous Waste Facilities by providing insurance to assure the payment of claims for property damage and personal injury resulting from sudden accidental occurrences. As required by state law, this insurance must be in the amount of at least \$1,000,000 per occurrence with an annual aggregate of at least \$2,000,000, exclusive of legal defense costs. Conoco Inc. has obtained insurance to meet this requirement.

Conoco Inc. has also complied with Section 7:26-9.10(h) of the New Jersey State Regulations guaranteeing financial assurance for closure of a hazardous waste facility by obtaining a surety bond, executed May 24, 1982.

Conoco Inc. requests that these state-required mechanisms be determined acceptable for meeting the financial and liability requirements of 40 CFR 264 and 265, in whole or in part. Copies of the evidence of insurance and surety bond have been enclosed for review. Conoco



Coca-Cola

11

1911  
Coca-Cola  
Atlanta, Ga.

Dear Sirs:

Very truly yours,

Wm. A. Rorer  
President  
Coca-Cola Bottling Co., Inc.  
Atlanta, Ga.

Enclosed for you are two copies of the  
report of the committee on the  
subject of the proposed  
amendment to the  
constitution of the  
Coca-Cola Bottling Association of America.

Very respectfully,  
Wm. A. Rorer

Ms. Helen S. Beggun  
Page 2  
August 23, 1982

understands that it will be deemed to be in compliance with such requirements. Conoco intends to provide whatever additional assurances are determined necessary.

Cordially yours,

A handwritten signature in dark ink, appearing to read "Mark J. Massad", with a long horizontal flourish extending to the right.

Mark J. Massad  
Analyst  
Domestic Insurance

jf  
Enc





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II  
26 FEDERAL PLAZA  
NEW YORK, NEW YORK 10278

JUL 30 1982

Harry D. Garrison  
Plant Manager  
Pitt-Consol Chemical Company  
191 Doremus Avenue  
Newark, New Jersey 07105

Re: Pitt Consol Chemicals  
NJD004948188

Dear Mr. Garrison:

I have recently had occasion to review a report on the December 8, 1981 re-inspection of Pitt-Consol's facility in Newark by representatives of the New Jersey Department of Environmental Protection. That inspection was conducted pursuant to the Resource Conservation and Recovery Act.

Although the continued presence of corroded drums was disturbing, the placement of hazardous waste drums in a diked-in area on a concrete pad had apparently led to an improvement in your hazardous waste management procedures. It appeared, however, that aisle space was inadequate for the 300 fifty-five gallon drums while they were stored prior to possible use as a supplementary fuel.

In addition, the asbestos present should be removed in accordance with applicable requirements, if this has not already been done. (See Title 40, Code of Federal Regulations, Section 61.22).

Sincerely yours,

William K. Sawyer  
Attorney  
General Enforcement Branch  
Enforcement Division

cc: Charles Elmendorf, Inspector  
Solid Waste Administration  
Bureau of Hazardous Waste  
New Jersey Department of  
Environmental Protection

bcc: Tom Taccone, 2PM-PA ✓

T. Taccone





## PERFORMANCE BOND FOR CLOSURE

Date bond executed: May 24, 1982  
Effective date: May 24, 1982  
Principal: Pitt-Consol Chemical Company  
191 Doremus Avenue, Newark, New Jersey 07105  
Type of organization: Corporation  
State of incorporation: New Jersey  
Surety: Federal Insurance Company  
300 Diamond Shamrock Tower, Dallas, Texas 75201

EPA identification Number NJD004948188, Pitt-Consol Chemical Company, 191 Doremus Avenue, Newark, Jersey 07105, and adjusted closure cost estimate for each facility: \$27,570.00  
Total penal sum of bond: \$2,000.00

Know all men by these presents, That we, Pitt-Consol Chemical Company as Principal and Federal Insurance Company as Surety hereto are firmly bound to the New Jersey State Department of Environmental Protection (hereafter called the Department), in the above penal sum for the payment of which we bind ourselves, our heirs, executors, administrators, successors and assigns, jointly and severally; provided that, where the Surety are corporations acting as cosureties, we, the Surety, bind ourselves in such sum "jointly and severally" only for the purpose of allowing a joint action or actions against any or all of us, and for all other purposes each Surety binds itself, jointly and severally with the Principal, for the payment of such sum only as is set forth opposite the name of such Surety, but if no limit of liability is indicated, the limit of liability shall be the full amount of the penal sum.

Whereas, the Principal is required to have a permit or permits issued pursuant to N.J.A.C. 7:26-12.1 et seq. in order to own or operate the hazardous waste management facility(ies), identified above, and

Whereas, the Principal is required to provide financial assurance for closure of the facility(ies) as a condition of the permit(s), and

Whereas the Principal shall establish a standby trust fund as specified by N.J.A.C. 7:26-9.10(h).

Now, therefore the conditions of the obligation are such that if the Principal shall faithfully perform closure of the facility(ies) identified above in accordance with the closure plan(s) submitted to receive said permit(s) and other requirements of said permit(s) as such plan(s) and permit(s) may be amended, pursuant to all applicable laws; statutes, rules, and regulations, as such laws, statutes, rules, and regulations may be amended.

1. The first part of the report is a summary of the work done during the period covered by the report. This includes a description of the work done, the results of the work, and a comparison of the results with the objectives of the work.

2. The second part of the report is a detailed description of the work done during the period covered by the report. This includes a description of the work done, the results of the work, and a comparison of the results with the objectives of the work.

3. The third part of the report is a detailed description of the work done during the period covered by the report. This includes a description of the work done, the results of the work, and a comparison of the results with the objectives of the work.

4. The fourth part of the report is a detailed description of the work done during the period covered by the report. This includes a description of the work done, the results of the work, and a comparison of the results with the objectives of the work.

5. The fifth part of the report is a detailed description of the work done during the period covered by the report. This includes a description of the work done, the results of the work, and a comparison of the results with the objectives of the work.

Or, if the Principal shall faithfully perform closure in accordance with N.J.A.C. 7:29-9.8 following an order to begin closure issued by the Department or by a court of competent jurisdiction as amended, or following a notice of termination of the permit pursuant to N.J.A.C. 7:26-12.1 et seq.

Or, if the Principal shall provide alternative financial assurance as specified in N.J.A.C. 7:26-0.10 within 30 days of the date notice of cancellation is received by the Department when this obligation will be null and void, otherwise it is to remain in full force and effect.

The Surety(ies) shall become liable on this bond obligation only when the Principal has failed to fulfill the conditions described above. Upon notification by the Department that the Principal has been found in violation of N.J.A.C. 7-26-9.10 in an order made pursuant of N.J.S.A. 13:1E-1 et seq. as amended, the Surety(ies) shall place funds in the amount of the adjusted closure cost estimate(s) into the standby trust fund as directed by the Department. Upon notification by the Department that the Principal has been found in violation of the closure requirements of N.J.A.C. 7:26-9.8 the Surety(ies) shall either perform closure in accordance with the closure plan(s) and other permit requirements or place the amount of the adjusted closure cost estimate(s) in the standby trust fund. Upon notification by the Department that the Principal has been found in violation of an order to begin closure, the Surety(ies) shall either perform closure in accordance with the closure order or place the amount of the adjusted closure cost estimate(s) in the standby trust fund.

The Surety(ies) hereby waives notification of amendments to the closure plan(s), permit(s), applicable laws, statutes, rules and regulations and agrees that no such amendment(s) shall in any way alleviate its (their) obligation on this bond.

The liability of the Surety(ies) shall not be discharged by any payment or succession of payments hereunder, unless and until such payment or payments shall amount in the aggregate to the penal sum of the bond, but in no event shall the obligation of the Surety(ies) hereunder exceed the amount of said penal sum.

The Surety(ies) may cancel the bond by sending written notice of cancellation to the owner or operator and to the Department provided, however, that cancellation cannot occur: (1) during the 90 days beginning on the date of receipt of the notice of cancellation by the Department as shown on the signed return receipt(s); or (2) while a compliance procedure is pending as defined in N.J.A.C. 7:26-9.10(b).

The Principal may terminate this bond by sending written notice to the Surety(ies), provided, however, that no such notice shall become effective until the Surety(ies) receive(s) written authorization for termination of the bond by the Department.

Or, if the Principal shall fail to perform the  
duties of the office, the Board of Directors may  
remove him from office and elect another in his  
place.

The Board of Directors may also remove any  
officer or director who is guilty of  
neglect of duty or who is otherwise  
unfit to hold office.

It is the policy of the Board of Directors  
to maintain the highest standards of  
conduct and efficiency in the management  
of the affairs of the corporation.

The Board of Directors shall have the  
power to make and alter the bylaws of the  
corporation, subject to the approval of the  
shareholders. It shall also have the power  
to elect and remove officers and directors,  
and to fix their salaries and compensation.

The Board of Directors shall also have the  
power to borrow money for the corporation,  
and to issue bonds or other securities.

It is the duty of the Board of Directors  
to see that the corporation complies with  
all applicable laws and regulations, and to  
maintain accurate records of its affairs.

The Board of Directors shall also have the  
power to make such other and various  
provisions as may be deemed necessary and  
proper for the better management of the  
corporation.

IN WITNESS WHEREOF, the Board of Directors  
has hereunto set its hand and seal this  
first day of January, 1921.

Principal and Surety(ies) hereby agree to adjust the penal sum of the bond yearly so that it equals the adjusted closure cost estimate(s), provided that the amount of the cost estimate(s) does (do) not increase by more than 20 percent in any one year, and no decrease in the penal sum takes place without written permission of the Department.

In witness whereof, the Principal and Surety(ies) have executed this Performance Bond and have affixed their seals on the date set forth above.

The persons whose signatures appear below hereby certify that they are authorized to execute this surety bond on behalf of the Principal and Surety(ies).

Principal

Signature(s): Richard J. Anderson

Name(s) and title(s): Vice President

Corporate seal:

Corporate Surety(ies)

Name and Address: Federal Insurance Company 500 Diamond Shamrock Tower  
Dallas, Texas 75201

State of incorporation Texas

Liability limit: \$2,000.00

Signature(s): Connie C. Jensen

Name(s) and title(s): Attorney-in-fact

Corporate seal:



# POWER OF ATTORNEY

Know all Men by these Presents, That the FEDERAL INSURANCE COMPANY, 100 William Street, New York, New York, a New Jersey Corporation, has constituted and appointed, and does hereby constitute and appoint  
 Harold D. Price, Gregory Georgieff, Laqueta Moore, James W. Grove,  
 Candace L. Ruswell, Kenneth Killian and Connie C. Jensen of Dallas,  
 Texas-----

each its true and lawful Attorney-in-Fact to execute under such designation in its name and to affix its corporate seal to and deliver for and on its behalf as surety thereon or otherwise, bonds or obligations given or executed in the course of its business, and any instruments amending or altering the same, and consents to the modification or alteration of any instruments referred to in said bonds or obligations.

In Witness Whereof, the said FEDERAL INSURANCE COMPANY has, pursuant to its By-Laws, caused these presents to be signed by its Assistant Vice-President and Assistant Secretary and its corporate seal to be hereto affixed this  
 29th day of December 19 81

FEDERAL INSURANCE COMPANY  
 By



*George McClellan*

George McClellan  
 Assistant Vice-President

*Richard D. O'Connor*

Richard D. O'Connor  
 Assistant Secretary

STATE OF NEW JERSEY  
 County of Essex ss

On this 29th day of December 19 81 before me personally came Richard D. O'Connor to me known and by me known to be Assistant Secretary of the FEDERAL INSURANCE COMPANY, the corporation described in and which executed the foregoing Power of Attorney, and the said Richard D. O'Connor being by me duly sworn, did depose and say that he is Assistant Secretary of the FEDERAL INSURANCE COMPANY and knows the corporate seal thereof; that the seal affixed to the foregoing Power of Attorney is such corporate seal and was thereto affixed by authority of the By-Laws of said Company, and that he signed said Power of Attorney as Assistant Secretary of said Company by like authority; and that he is acquainted with George McClellan and knows him to be the Assistant Vice-President of said Company, and that the signature of said George McClellan subscribed to said Power of Attorney is in the genuine handwriting of said George McClellan and was thereto subscribed by authority of said By-Laws and in deponent's presence.

Acknowledged and Sworn to before me  
 on the date above written.



*Patricia Ryan*  
 Notary Public

PATRICIA RYAN  
 NOTARY PUBLIC OF NEW JERSEY  
 My Commission Expires December 11, 19 83

POWER OF ATTORNEY

Know all Men by these presents, that I, JOHN J. KENNEDY, of the County of NEW YORK, State of NEW YORK, do hereby certify that the within and foregoing is a true and correct copy of the original thereof, as the same appears by the records of the County of NEW YORK, State of NEW YORK, and I do hereby certify that the within and foregoing is a true and correct copy of the original thereof, as the same appears by the records of the County of NEW YORK, State of NEW YORK.

Witness my hand and seal of office, this 10th day of April, 1941, at the City of New York, State of New York.

*[Signature]*

*[Signature]*

Notary Public in and for the State of New York

*[Signature]*

*[Signature]*



CITY OF SHORT HILLS }

County of Essex

ss.

I, the undersigned, Assistant Secretary of the FEDERAL INSURANCE COMPANY, do hereby certify that the following is a true excerpt from the By-Laws of the said Company as adopted by its Board of Directors on March 11, 1953 and amended May 27, 1971 and that this By-Law is in full force and effect.

"ARTICLE XVIII.

Section 2. All bonds, undertakings, contracts and other instruments other than as above for and on behalf of the Company which it is authorized by law or its charter to execute, may and shall be executed in the name and on behalf of the Company either by the Chairman or the Vice-Chairman or the President or a Vice-President, jointly with the Secretary or an Assistant Secretary, under their respective designations, except that any one or more officers or attorneys-in-fact designated in any resolution of the Board of Directors or the Executive Committee, or in any power of attorney executed as provided for in Section 3 below, may execute any such bond, undertaking or other obligation as provided in such resolution or power of attorney.

Section 3. All powers of attorney for and on behalf of the Company may and shall be executed in the name and on behalf of the Company, either by the Chairman or the Vice-Chairman or the President or a Vice-President or an Assistant Vice-President, jointly with the Secretary or an Assistant Secretary, under their respective designations.

And I further certify that I have compared the foregoing copy of the POWER OF ATTORNEY with the original thereof and the same is a correct and true copy of the whole of said original Power of Attorney and that said Power of Attorney has not been revoked.

And I further certify that said FEDERAL INSURANCE COMPANY is duly licensed to transact fidelity and surety business in each of the States of the United States of America, District of Columbia, Puerto Rico, and each of the Provinces of Canada with the exception of Prince Edward Island, and is also duly licensed to become sole surety on bonds, undertakings, etc., permitted or required by law.

Given under my hand and the seal of said Company at Short Hills, N.J. this 24th \_\_\_\_\_ day of  
May 19 82

  
Assistant Secretary





AN

NJD004948188

Pitt-Consol Chemicals  
Conoco Inc.  
191 Doremus Avenue  
Newark, NJ 07105  
(201) 344-3800

PERMITS ADMINISTRATION  
FEB 12 10 17 AM '81  
ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10007

February 6, 1981

Permits Administration Branch  
U.S. E.P.A. - Region II  
26 Federal Plaza, Room 432  
New York, New York 10278

Gentlemen:

This letter is in response to your most recent letter of inquiry dated February 3, 1981 regarding hazardous waste activities at our facility. We responded to the October, 1980 letter of inquiry both telephonically and by registered mail. Our EPA Hazardous waste activity number is NJD004948188. Copies of pertinent correspondence on this subject are attached.

If the information submitted is inadequate, please advise as soon as possible. Unless directed otherwise, no further action will be taken on this matter.

Very truly yours,

Harry D. Garrison  
Plant Manager

sag  
Enc

Registered Mail-RRR

cc: w/o Attachments: Julio Morales Sanchez  
Director, Enforcement Division

Registered Mail-RRR



THE CHASE  
BANK  
OF  
THE  
UNITED STATES

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ATTACHMENTS:

- 1) EPA Letter of Inquiry (February 3, 1981)
- 2) Acknowledgment of Notification of Hazardous Waste Permit Application
- 3) Hazardous Waste Permit Application
- 4) Response to EPA Letter of Inquiry (October 3, 1980) with copy of return receipt.
- 5) EPA Letter of Inquiry (October 3, 1980)
- 6) Acknowledgment of Notification of Hazardous Waste Activity
- 7) Notification of Hazardous Waste Activity

FEB 12 10 17 AM '81  
ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10007



David A. Kuhn  
Director  
Environmental Conservation

Morales Sanchez  
Conoco Inc.  
5 Greenway Plaza East  
P.O. Box 2197  
Houston, TX 77001  
(713) 965-3640

16 December 1980

Mr. Charles S. Warren  
Region II Administrator  
U.S. Environmental Protection Agency  
Room 1009  
26 Federal Plaza  
New York, New York 10007

Greetings:

We have learned that notices of violation have been sent to us by EPA Regional Offices because they have not received information from us required by the Resource Conservation and Recovery Act. This is likely due to confusion about our corporate name.

On July 1, 1979, we changed our name from Continental Oil Company to Conoco Inc. After that time, Conoco Inc. would be used for all official business, including notices and registrations required recently by the Resource Conservation and Recovery Act. Apparently EPA is citing us when they find no information submitted under the old name.

Please notify your staff of this change so both EPA and Conoco Inc. can avoid the confusion caused by this name change.

Sincerely,

David A. Kuhn

ENVIRONMENTAL PROTECTION AGENCY  
NEW YORK, NY  
DEC 22 4 11 PM '80  
/sbr  
REGION II  
CONOCO INC.

RECEIVED

12/31

ON - 1-26-80  
MH - Amended Name  
Card 1 -  
Conoco Inc / PTH - Counsel - ches  
comp







Pitt-Consol Chemicals  
Continental Oil Company  
191 Doremus Avenue  
Newark, New Jersey 07105  
(201) 344-3800

October 8, 1980

Ms. Roma Phillips  
Information Service Center  
U.S.E.P.A. - Region II  
26 Federal Plaza  
New York, New York 10278

Dear Ms. Phillips:

This letter is to confirm our phone discussion on October 7, 1980 regarding the multiple facility numbers (RCRA) that we have received from your agency.

Facility Address and Number

Status

1 Continental Oil Co., Inc.  
191 Doremus Ave  
Newark, NJ 07105  
NJD004948188

Used this number to file August 18, 1980 notification; however, corrected company name to Pitt-Consol Chemical Co.

2 Pitt-Consol Chemical Company  
High Ridge Park  
Stamford CT 06904  
CTD004322277

As per your recommendation, our corporate office in Stamford will contact Region I indicating that there is no plant at this address, just corporate offices.

3 Continental Oil Co., Inc.  
191 Doremus Avenue  
Newark NJ 07102  
NJD002154789

Please delete this number. It is for the same facility as the first one listed above except that the zip code is wrong. Attached is a copy of the notification which we received concerning this. We are disregarding this unless we are directed otherwise.

If you have any questions, feel free to call.

*William F. Revelt*  
William F. Revelt  
Senior Process Engineer

sag  
Registered Mail - RRR

*It to see if 3  
is deleted. by file*





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

26 FEDERAL PLAZA

NEW YORK, NEW YORK 10278

October 3, 1980

NJCC02154789

CONTINENTAL OIL CO INC

191 DOREMUS AVENUE  
NEWARK

NJ 07102

Dear Sir:

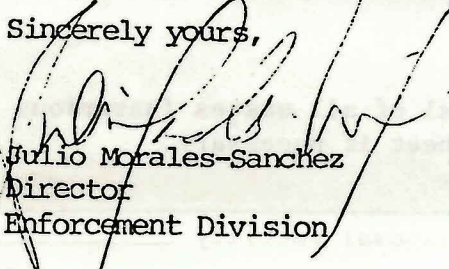
The United States Environmental Protection Agency ("EPA") regulates the handling of hazardous wastes under the Resource Conservation and Recovery Act ("RCRA") 42 U.S.C. §6901 et seq. Under Section 3010 of RCRA, 42 U.S.C. §6930, parties handling certain quantities of hazardous wastes (these wastes are characterized and listed in regulations which were published in the Federal Register of May 19, 1980, 45 FR 33084 et seq. and July 16, 1980, 45 FR 47832 et seq.) are required to notify EPA of their activities. Facilities handling wastes defined by the May 19, 1980 regulations were required to notify by August 18, 1980. Facilities handling wastes defined by the July 16, 1980 regulations are required to notify by October 14, 1980. We have not yet received a notification from you or your company.

Section 3007 of RCRA, 42 U.S.C. §6927, allows EPA to request certain information of parties who handle hazardous wastes. Based upon information available to this Agency, we believe that you or your company handles such hazardous wastes. Therefore, in order to determine the extent of your hazardous waste activity, and to determine whether you should have notified EPA pursuant to §3010, we require that you complete the questionnaire on the reverse side of this letter. Your completed form should be returned to us within 21 days of the date of this letter. The questionnaire must be completed and signed by a responsible official of your firm. If you have already notified EPA of your hazardous waste activity, please complete the questionnaire but indicate on the form your prior notification and list your EPA Identification Number, if available.

Your failure to respond to this letter in a timely manner may subject you to the initiation of enforcement action under Section 3008 of RCRA, 42 U.S.C. §6928. Such enforcement action may include the assessment of substantial penalties for continued non-compliance.

Completion of the questionnaire on the reverse side of this letter does not constitute notification under RCRA. If you have any questions on the contents of this letter or desire a notification package, please write the EPA Information Service Center (ISC) of 26 Federal Plaza, New York, New York 10278.

Sincerely yours,

  
Julio Morales-Sanchez  
Director  
Enforcement Division



Hazardous Waste Activity Questionnaire

1. Do you generate hazardous wastes as listed or characterized by the May 19, 1980 and/or the July 16, 1980 Federal Register?

- ☐ Yes. If yes, specify the maximum rate of generation (kilograms/month)\* \_\_\_\_\_.
- ☐ No waste generated.
- ☐ Wastes are generated but all wastes are not hazardous.
- ☐ Hazardous wastes are generated, but are excluded under the provisions of 40 CFR Section 261.5, as indicated below:
- ☐ Generate greater than zero but less than 1000 kilograms\*/month of waste listed in 40 CFR Sections 261.31, 261.32 and 261.33(f).
- ☐ Generate greater than zero but has less than 1 kilogram\*/month of acutely toxic waste listed in 40 CFR Section 261.33(e).
- ☐ Generate greater than zero but less than 10 kilograms\*/month of container inner liners (see 40 CFR Sections 261.5(c) and 261.33(e)).
- ☐ Generate greater than zero but less than 100 kilograms\*/month of spill residues (see 40 CFR Sections 261.5(c) and 261.33(e)).

2. Do you transport or are hazardous wastes transported off your site?

- ☐ Yes, hazardous wastes are transported off-site using company vehicles. Maximum amount (kilograms)\* per month \_\_\_\_\_.
- ☐ Yes, hazardous wastes are transported off-site utilizing a contract carrier. Specify carrier name(s) and amounts \_\_\_\_\_.
- ☐ Yes, hazardous wastes are transported off-site but all wastes are excluded under 40 CFR Section 261.5.
- ☐ No wastes are transported off-site.
- ☐ Wastes are transported off-site but all wastes are not hazardous.

3. Do you receive or accept hazardous waste from other facilities for transportation to another site?

- ☐ Yes. If yes, maximum amount at one time (kilograms)\* \_\_\_\_\_.
- Maximum amount from any one facility (kilograms)\* \_\_\_\_\_.
- Specify mode of transportation \_\_\_\_\_.
- ☐ No.

4. Do you treat hazardous wastes?

- ☐ Yes. Maximum amount treated (kilograms)\* in any month \_\_\_\_\_.
- ☐ No wastes treated.
- ☐ All wastes treated are non-hazardous.

5. Do you store hazardous wastes?

- ☐ Yes. Maximum amount stored (kilograms)\* at one time \_\_\_\_\_.
- Maximum length of storage (days) after generation or receipt \_\_\_\_\_.
- ☐ No wastes stored.
- ☐ Wastes are stored but all wastes are non-hazardous.

6. Do you dispose of hazardous wastes on your property?

- ☐ Yes. Maximum amount disposed on-site in one month (kilograms)\* \_\_\_\_\_.
- ☐ No wastes disposed.
- ☐ Wastes are disposed but are non-hazardous.

7. Please indicate briefly the ultimate method of disposal of all wastes (hazardous and non-hazardous) from your facility. Attach separate sheet if necessary.

- ☐ Disposed on-site. Specify method \_\_\_\_\_.
- ☐ Disposed off-site. Specify method and name of disposal facility \_\_\_\_\_.

8. Have you already notified EPA of your hazardous waste activity?

- ☐ Yes. If yes, indicate EPA Identification Number if available \_\_\_\_\_.
- ☐ No.

\*1 kilogram=2.20 pounds

\_\_\_\_\_  
Printed Name of Person Completing Questionnaire

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

# AMENDATORY ENDORSEMENT POLLUTION LIABILITY



THE HARTFORD

This endorsement modifies such insurance as is afforded by the provisions of the policy relating to the following  
**COMPREHENSIVE GENERAL LIABILITY INSURANCE**  
**COMPREHENSIVE — PLUS SPECIAL GENERAL LIABILITY INSURANCE**  
**SMP LIABILITY INSURANCE**

Premium for This Endorsement \$ INCLUDED

## Part I Separate Limits of Liability Endorsement (Hazardous Waste Facility)

It is agreed that:

1. The limits of liability stated in the Hazardous Waste Facility Pollution Liability Endorsement in Part II apply separately to such insurance as is afforded by the policy in connection with the Insured's obligation to demonstrate financial responsibility at the facilities described therein.
2. Such limits of liability apply collectively to all such facilities (and not separately to each) and are in lieu of and not in addition to any other limits of liability stated elsewhere in the policy.
3. The "each occurrence" limit applies to all bodily injury and all property damage arising out of a single occurrence.
4. The annual "aggregate" limit applies to all damages because of all bodily injury and all property damage which occurs during the policy period.
5. For the purpose of determining the limit of the company's liability, all bodily injury and property damage arising out of a sudden and accidental discharge, dispersal, release or escape of irritants, contaminants or pollutants, including all bodily injury and property damage arising out of all subsequent exposure of persons or property to such substances, shall be considered as arising out of a single occurrence.
6. Part I of this endorsement shall be cancelled automatically by cancellation of the Hazardous Waste Facility Pollution Liability Endorsement in Part II.

## Part II Hazardous Waste Facility Pollution Liability Endorsement

1. This endorsement certifies that the policy to which the endorsement is attached provides pollution liability insurance covering bodily injury and property damage in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA Identification Number: NJD 004948188

Name: CONOCO INC

Address: NEWARK N J

for sudden accidental occurrences. The limits of liability are \$ 1,000,000 "each occurrence" and \$ 2,000,000 annual aggregate, exclusive of legal defense costs.

2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy, provided, however, that any provisions of the policy inconsistent with subsections (a) through (e) of the Paragraph 2 are hereby amended to conform with subsections (a) through (e):
  - (a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.
  - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
  - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
  - (d) Cancellation of this endorsement, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.
  - (e) Any other termination of this endorsement will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.

Attached to and forming part of Policy No. 10 CLR P12421E

issued by HARTFORD ACCIDENT AND INDEMNITY COMPANY

(Name of Insurer)

, herein called the Insurer,

of 123 WILLIAM ST NEW YORK N Y 10038 to CONOCO INC

(Address of Insurer)

(Name of Insured)

of P O BOX 1267 PONCA CITY OK 74601

(Address of Insured)

this 1ST day of JANUARY, 19 83. The effective date of said policy is

1ST day of JANUARY, 19 83.

I hereby certify that the wording of this endorsement is identical to the wording specified in 40 CFR 264.151(i) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

William G. O'Connor  
 (Signature of Authorized Representative of Insurer)

WILLIAM G. O'CONNOR

(Type Name)

ACCOUNT SUPERVISOR

(Title)

Authorized Representative of

HARTFORD ACCIDENT & INDEMNITY CO.

(Name of Insurer)

123 WILLIAM ST NEW YORK N Y 10038

(Address of Representative)

ATTENDATORY ENDORSEMENT POLLUTION LIABILITY

2025 APR 6 10 10 AM

ENCLOSURE

GRANTS ADMINISTRATION  
BRANCH  
RECEIVED

APR 6 2 08 PM '83

ENVIRONMENTAL  
NEW YORK, N.Y.

WLD 00000000

CONOCO INC  
NEW YORK, N.Y.

1,000,000

2,000,000

HARTFORD ACCIDENT AND INDEMNITY COMPANY  
TO CLERK PLEASE

123 WILLIAM ST NEW YORK N.Y. 10038 CONOCO INC

P.O. BOX 1237 PUNCA CITY OK 74601

1ST JANUARY 1983  
1ST JANUARY 1983

HARTFORD ACCIDENT & INDEMNITY CO.

123 WILLIAM ST NEW YORK N.Y. 10038

123 WILLIAM ST NEW YORK N.Y. 10038